HOUSING AUTHORITY
of the County of Los Angeles
Administrative Office
2 Coral Circle • Monterey Park, CA 91755
323.890.7001 • TTY: 323.838.7449 • www.lacdc.org

Gloria Molina
Yvonne Brathwaite Burke
Zev Yaroslavsky
Don Knabe
Michael D. Antonovich
Commissioners

Carlos Jackson
Executive Director

August 8, 2006

Honorable Board of Commissioners
Housing Authority of the
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Dear Commissioners:

APPROVAL OF NINTH ALLOCATION OF CITY OF INDUSTRY REDEVELOPMENT HOUSING SET-ASIDE FUNDS FOR SPECIAL NEEDS DEVELOPMENT AND APPROVAL OF ENVIRONMENTAL DOCUMENTATION (1)
(3 Vote)

IT IS RECOMMENDED THAT YOUR BOARD:

1. Acting as a responsible agency pursuant to the California Environmental Quality Act (CEQA), certify that the Housing Authority has considered the attached Initial Study/Mitigated Negative Declaration (IS/MND), including any public comments, for the Young Women's Christian Association of Greater Los Angeles (YWCA)/Job Corps Urban Campus development project to be located at 1016, 1026-1032 South Olive Street, Los Angeles, prepared by the City of Los Angeles as lead agency, and find that the mitigation measures identified in the IS/MND are adequate to avoid or reduce potential environmental impacts to below significant levels.

2. Approve a loan to the YWCA (Developer) using City of Industry Redevelopment Housing Set-Aside Funds (Industry Funds), in a total amount not to exceed $2,000,000, for the development of the YWCA/Job Corps Urban Campus project, which has been selected through a Request for Proposals (RFP) in February 2006.

3. Authorize the Executive Director to negotiate and execute the Loan Agreement and all related documents with the Developer for the purposes described above, to be effective following approval as to form by County Counsel and execution by all parties.

4. Authorize the Executive Director to execute documents to subordinate the loan to permitted construction and permanent financing, to execute any necessary intergovernmental, interagency, or inter-creditor agreements, and to execute and modify all related documents as necessary for the implementation of the above development.

5. Authorize the Executive Director to incorporate a maximum of $2,000,000 in Industry Funds into the Housing Authority's approved Fiscal Year 2006-2007 budget, as needed, to fund development of the recommended development.

PURPOSE /JUSTIFICATION OF RECOMMENDED ACTION:

The purpose of this action is to approve the allocation of Industry Funds to fund construction of the YWCA/Job Corps Urban Campus development, which will provide special needs rental housing in an incorporated area within a 15-mile radius of the City of Industry, and to approve the environmental documentation for this development.

FISCAL IMPACT/FINANCING:

There is no impact on the County general fund. The Housing Authority is recommending a loan to the Developer in a total amount not to exceed $2,000,000 to fund construction of the YWCA/Job Corps Urban Campus development.

The final loan amount will be determined following completion of negotiations with the Developer and arrangements with other involved lenders. The loan will be evidenced by a promissory note and secured by a deed of trust, with the term of affordability enforced by a recorded Covenants, Conditions and Restrictions. Funds for this loan will be included in the Housing Authority's approved Fiscal Year 2006-2007budget.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS:

Industry Funds consist of 20 percent of tax increment funds collected by the City of Industry's Redevelopment Agency that have been transferred to the Housing Authority to develop low- and moderate-income housing. Previous RFP processes have awarded a total of approximately $125,308,193 in Industry Funds to 147 developments, creating 5,154 units of affordable and special needs housing, and leveraging over $844,799,823 in other sources of funds.

The ninth RFP process has now been completed. The original amount established for the ninth allocation was approximately $10,085,583, with any unallocated funds to be "rolled over" into future funding rounds.

In the ninth round, in response to the Special Needs RFP, the three proposals received for special needs housing were incomplete and failed to meet the threshold

requirements established by the RFP. As a result, the RFP for special needs housing was reissued and proposers were given another opportunity to submit a proposal. Two proposals were received in response to the Special Needs Housing Second RFP. Of the two proposals received, the YWCA/Job Corps Urban Campus development received 70.769 points and the Mt. Carmel Residency received 51.574 points.

The recommended special needs development will create 70 Industry Fund-assisted units with the capacity for up to 140 program participants, and leverage a total of $56,600,000 in other sources of funds. The newly constructed 7-story facility will include housing, comprehensive support services, health facilities, library, classrooms, recreational areas, computer rooms, kitchen/dining hall, and administrative offices. All program services, including housing, will be free of charge to participants, who must have low-income status.

A summary of the recommended allocation is provided as Attachment A.

The current funding recommendation will provide Industry Funds to the Developer through a loan agreement to be executed by the Executive Director, following completion of financial arrangements and approval as to form by County Counsel. The loan agreement will incorporate affordability restrictions, terms and conditions established by the Housing Authority, and provisions requiring developer to comply with all applicable federal, state, and local laws.

The loan agreement will set aside 70 Industry Fund-assisted units to be occupied by low-income persons with annual incomes that do not exceed 50 percent of the median income for the Los Angeles-Long Beach Metropolitan Statistical Area (MSA), adjusted for family size, as established by the U.S. Department of Housing and Urban Development (HUD). The loan agreement will require that the housing units be set-aside for a period of 55 years. This letter has been reviewed by County Counsel.

REQUEST FOR PROPOSALS AND SELECTION PROCESS:

The Housing Authority conducted the re-issuance of the ninth RFP for special needs housing in accordance with the Allocation and Distribution Plan adopted by your Board. On February 8, 2006, the Housing Authority began advertising the RFP in local newspapers and initiated informational workshops to provide applicants with technical assistance. The Housing Authority conducted an informational meeting for all potential applicants in February 2006. Proposals were accepted until March 20, 2006.

Each proposal was reviewed by Housing Authority staff and technical consultants. Following this process, the proposals were forwarded to an independent review panel comprised of industry and government experts.

The recommended funding award to the Developer is based on the same threshold criteria adopted for the last allocation, whereby projects scoring a minimum of 70 points

are eligible for funding. The recommended award is being made in accordance with the County's current Housing and Community Development Plan (HCDP) and the planning documents of other affected jurisdictions. The Executive Director may enter into memoranda of understanding and other agreements with other jurisdictions, if necessary, for development of the proposed projects.

ENVIRONMENTAL DOCUMENTATION:

As a responsible agency, and in accordance with the requirements of the State CEQA Guidelines, the Housing Authority reviewed the YWCA/Job Corps Urban Campus IS/MND and determined that the mitigation measures identified for this project by the City of Los Angeles, as lead agency, are adequate to avoid, or reduce below significant levels, potentially adverse impacts on the environment. The Housing Authority's consideration of the IS/MND, including mitigation measures, and filing of a Notice of Determination, will satisfy the State CEQA Guidelines as stated in Article 7, Section 15096.

CONCLUSION:

The recommended allocation of Industry Funds not to exceed $2,000,000 will leverage $56,600,000 from other sources of funds for the selected development.

Qualified applicants not currently recommended for funding have been encouraged to resubmit applications for funding in subsequent RFP processes.

IMPACT ON CURRENT PROGRAM:

This action will increase the County's supply of affordable special needs housing.

Respectfully submitted,

CARLOS JACKSON
Executive Director

CJ:CH

Attachments: 2

ATTACHMENT A

RECOMMENDED ALLOCATIONS - NINTH RFP
FOR CITY OF INDUSTRY FUNDS FOR INCORPORATED AND UNINCORPORATED AREAS
SPECIAL NEEDS HOUSING DEVELOPMENTS

District	Location	Development/Applicant	Type of Development	No. of Units	Set-Aside Units	Industry Funds Recommended	Local and Other Resources	Total Development Cost
1	Downtown Los Angeles	YWCA/Jobs Corp. Urban Campus /Young Women's Christian Association of Greater Los Angeles	Emancipated Youth	140	70	$ 2,000,000	$ 56,600,000	$ 58,600,000
				140	70	$ 2,000,000	$ 56,600,000	$ 58,600,000

THE COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES

FILED

JUN 0 3 2005

CONNY B. McCORMACK, COUNTY CLERK
K.S. ESPERANZ
DEPUTY

CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF DETERMINATION

(Article V, Section 7; Article VI, Section 13, CRA CEQA Guidelines)

RECEIVED
RECORDS MGMT

'05 JUL -6 P6:33

County Clerk
County of Los Angeles
12400 East Imperial Highway
Norwalk, California 90650

FROM: Urban Campus

The Community Redevelopment
Agency of the City of Los Angeles
354 S. Spring Street, Suite 500
Los Angeles, California 90013

SUBJECT: Filing of Notice of Determination in Compliance with Section 21108 or 21152 of the Public Resources Code

PROJECT TITLE
YWCA Job Corps Residential Facility

STATE CLEARINGHOUSE NUMBER
N/a

CONTACT PERSON
Pauline Lewicki, Principal Planner

TELEPHONE NO.
213-977-1952

PROJECT LOCATION
1016-1038 South Olive Street in the City Center Redevelopment Project

PROJECT DESCRIPTION
Construction of a seven-story 154,000 gross square foot facility containing housing and dining for 400 students in 200 two-bedroom dormitory-style units with administrative offices located on the top floor, surrounding an 11,260 square foot courtyard containing passive open space and recreational facilities

This is to advise that on **May 19, 005** the Community Redevelopment Agency of the City of Los Angeles has approved the above-described project and made the following determinations:

1. The project ___will, **X** will not have a significant effect on the environment due to the mitigation measures required.

2. ___An Environmental Impact Report was prepared for this project pursuant to the provisions of CEQA and certified on_____

   X A Mitigated Negative Declaration was prepared for this project pursuant to the provisions of CEQA.

   The EIR or Negative Declaration and record of project approval may be examined at the Agency's Central Office.

3. Mitigation measures **X** were,___were not, made a condition of the approval of the project.

4. A Statement of Overriding Considerations ___was, **X** was not adopted for this project.

Pauline Lewicki

Pauline Lewicki
Principal Planner

Date Received for filing by County Clerk:

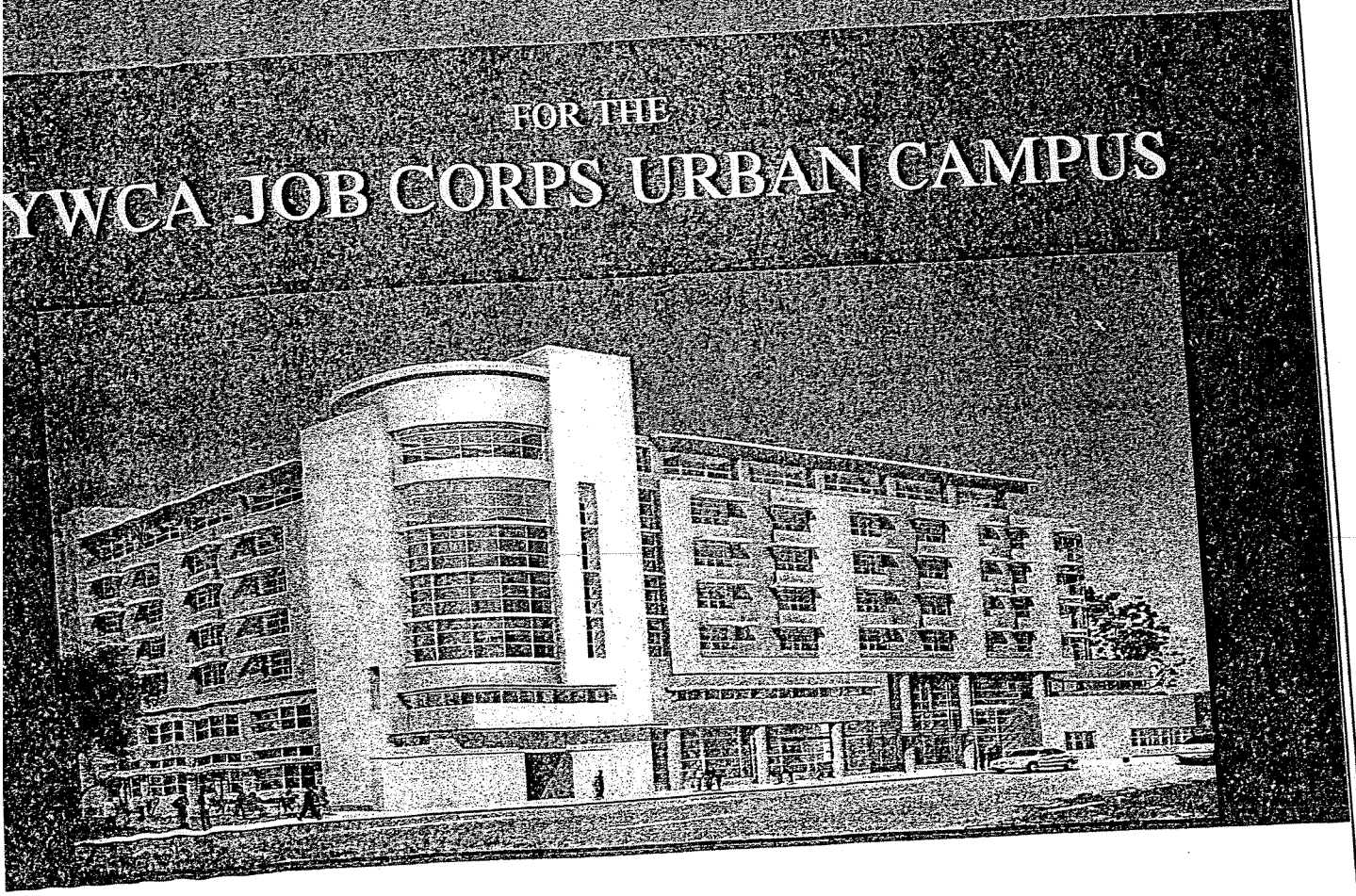
Pauline Lewicki

THIS NOTICE WAS POSTED
ON JUN 0 3 2005
UNTIL JUL 0 4 2005

INITIAL STUDY

FOR THE

YWCA JOB CORPS URBAN CAMPUS



Prepared for:

City of Los Angeles
Community Redevelopment Agency
354 South Spring Street, Suite 700
Los Angeles, CA 90013

Applicant:

YWCA of Greater Los Angeles
3345 Wilshire Blvd., Suite 300
Los Angeles, CA 90010

Prepared by:

CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

March 2005

11849 W. Olympic Boulevard, Suite 101 · Los Angeles, CA 90064 · Phone 310-473-1600 · Fax 310-473-9336
31255 Cedar Valley Drive, Suite 222 · Westlake Village, CA 91362 · Phone 818-735-8838 · Fax 818-735-8858
101 H Street, Suite Q Petaluma, CA 94952 Phone 707-283-4040 Fax 707-283-4041
web www.cajaeir.com e-mail cajaeir@cajaeir.com

YWCA - JOB CORPS URBAN CAMPUS

INITIAL STUDY

PREPARED FOR:
City of Los Angeles
Community Redevelopment Agency
354 South Spring Street
Los Angeles, California 90013

APPLICANT:
YWCA of Greater Los Angeles
3345 Wilshire Boulevard
Los Angeles, California 90010

PREPARED BY:
Christopher A. Joseph & Associates
11849 West Olympic Boulevard, Suite 101
Los Angeles, California 90064

March 2005

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FIGURES

TABLES

APPENDICES

I. INTRODUCTION

The subject of this Initial Study (IS) is the proposed Job Corps Urban Campus located between Olive Street and Hill Street, just south of Olympic Boulevard in Downtown Los Angeles. The project applicant is the YWCA of Greater Los Angeles, located at 3345 Wilshire Boulevard, Suite 300, Los Angeles, California 90010. A description of the proposed project is provided in Section II, Project Description, of this IS. The City of Los Angeles Community Redevelopment Agency is the Lead Agency under the California Environmental Quality Act (CEQA).[1]

A. PROJECT INFORMATION

Project Title: YWCA Job Corps Urban Campus

Project Location: 1016-1038 South Olive Street

Lead Agency: City of Los Angeles, Community Redevelopment Agency (CRA)
354 South Spring Street, Suite 700
Los Angeles, California 90013

CRA Contact Person: Pauline Lewicki

B. ORGANIZATION OF INITIAL STUDY

This Draft IS is organized into six sections as follows:

Introduction: This section provides introductory information such as the project title, the project applicant, and the lead agency for the proposed project.

Project Description: This section provides a detailed description of the environmental setting and the proposed project, including project characteristics and environmental review requirements.

Initial Study Checklist: This section contains the completed Initial Study Checklist.

Environmental Impact Analysis: Each environmental issue identified in the Initial Study Checklist contains an assessment and discussion of impacts associated with each subject area. When the evaluation identifies potentially significant effects, as identified in the Checklist, mitigation measures are provided to reduce such impacts to a less-than-significant level.

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1 *Sections 21000-21178 of the Public Resources Code.*

Preparers of the Initial Study and Persons Consulted: This section provides a list of CRA and City personnel, government agencies, and consultant team members that participated in the preparation of the IS.

Appendices: This includes various documents and information used in the preparation of the IS.

II. PROJECT DESCRIPTION

A. ENVIRONMENTAL SETTING

Description of Project Site and Existing Land Uses

The project site encompasses approximately 0.84 acres (36,532 square feet) and is located at 1016 through 1038 Olive Street in Downtown Los Angeles. The following Assessor Parcel Numbers are associated with the project site: 5139012009, 5139012008, 5139012007, and 5139011012. Topographically, the project site is relatively flat. As shown in Figure 1 (Regional and Vicinity Map) and Figure 2 (Aerial Photograph), the northern boundary of the project site is located approximately 150 feet south of Olympic Boulevard, the southern boundary of the project site is approximately 200 feet north of 11th Street, Olive Street bounds the project site to the west, and an existing alley bounds the project site to the east.

The project site is currently occupied by a 175-space surface parking lot. Access to the project site is provided from Olive Street. Photographs of the project site, in addition to a map indicating where the photos were taken, are depicted in Figure 3 (Photo Location Map) through Figure 9 (Views of the Project Site).

The project site is located within the Central City Community Plan area and the City Center Redevelopment Project area. The Central City Community Plan (the "Community Plan") designates the project site for High Density Residential land uses. The City Center Redevelopment Plan (the "Redevelopment Plan") delineates the area surrounding and including the project site as the South Park Development Area. Section 508.3 of the Redevelopment Plan states that a major share of land uses in the South Park Development Area shall be devoted to housing for all income levels, and include specialized facilities and amenities. The Community Plan and the Redevelopment Plan are discussed in further detail in the discussion under Question 9(b) in Section IV, Environmental Impact Analysis, of this Initial Study.

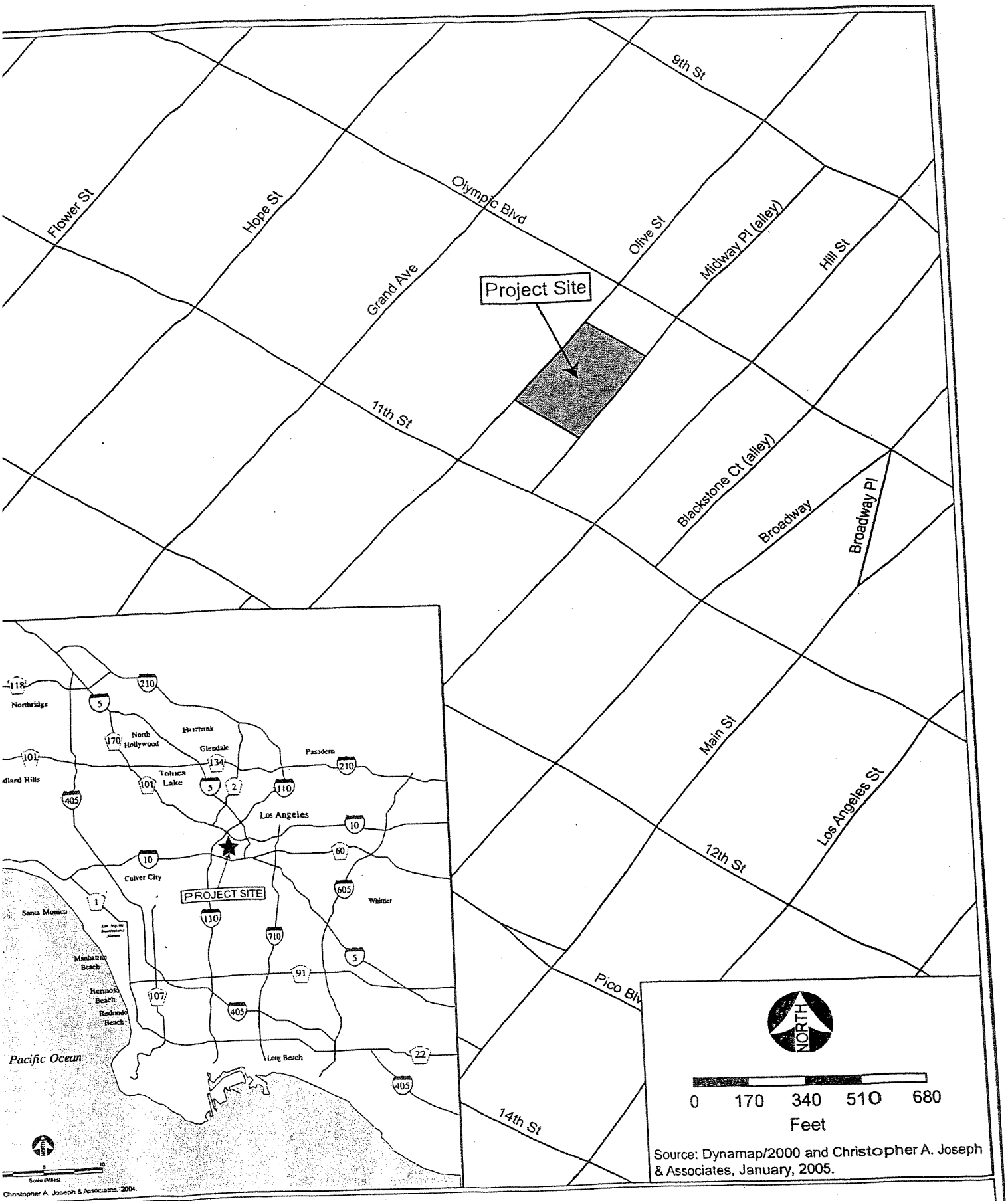
The project site is currently zoned as [Q]R5-4D-O (Multiple Dwelling Zone, Height District 4, Development Limitation, Oil Drilling District). Height District 4 restricts the Floor Area Ratio (FAR) to 13:1 in the R5 zone. City of Los Angeles Ordinance No. 164307 set forth Development Limitations and Qualified [Q] Conditions for the project site. The Development Limitations include limiting the total floor area to 6:1. The Qualified Conditions include limiting allowable land uses to residential uses permitted in the R5 zone, consistency with the Community Plan and the Redevelopment Plan, and other similar conditions. The Oil Drilling District designation permits oil drilling to occur on the project site. However, no oil wells currently exist on the project site. Additional information regarding potential mineral resources on the project site, including oil, is provided in the response to Question 10(b) in Section IV, Environmental Impact Analysis.

Description of the Surrounding Area

The project site and surrounding area is within the densely developed urban area of Downtown Los Angeles. Single-story buildings consisting of wholesale, commercial and retail businesses are located to north, west, and south of the project site. A printing company, watch store, immigration office and wholesale store fixtures company are located to the west of the project site (see View 7 in Figure 6). In addition, a surface parking lot is located directly west of the project site and extends north to Olympic Boulevard (see View 11 in Figure 7). Two vacant buildings and the Discount Tire Centers business are located adjacent to the northern boundary of the project site (see Views 8 and 9 in Figure 6 and View 12 in Figure 7). Single-story buildings containing three vacant stores, an embroidery company and wholesale store fixtures company are located adjacent to the southern boundary of the project site and extend to 11th Street (see View 10 in Figure 7).

Midway Place is a north-south orientated alley that flanks the eastern boundary of the project site and runs parallel to and between Olive Street and Hill Street, dividing the block between Olympic Boulevard and 11th Street in half (see View 13 in Figure 8 and View 18 in Figure 9). A variety of commercial, retail, restaurant and parking uses are located to the east of this alley between Olympic Boulevard and 11th Street. The southwest corner of Olympic Boulevard and Hill Street contains a single-story building with two women's clothing stores, restaurant, psychic reader and printing business (see View 14 in Figure 8). Two surface parking lots and the existing six-story Los Angeles Job Corps building are located south of this single-story building.

South of the existing Los Angeles Corps building, there are surface parking lots, a two-story unmarked building used by the YWCA-Job Corps, and a single-story vacant building. The northwest corner of Hill Street and 11th Street contains Tony's Burger, a fast-food restaurant, and its adjoining surface parking lot (see View 15 in Figure 8). Three additional two-story buildings, which are used by the YWCA-Job Corps, extend from this surface parking lot to Olive Street along 11th Street (see Views 16 and 17 in Figure 9).



CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure 1
Regional and Vicinity Map

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Figure 2
Aerial Photograph

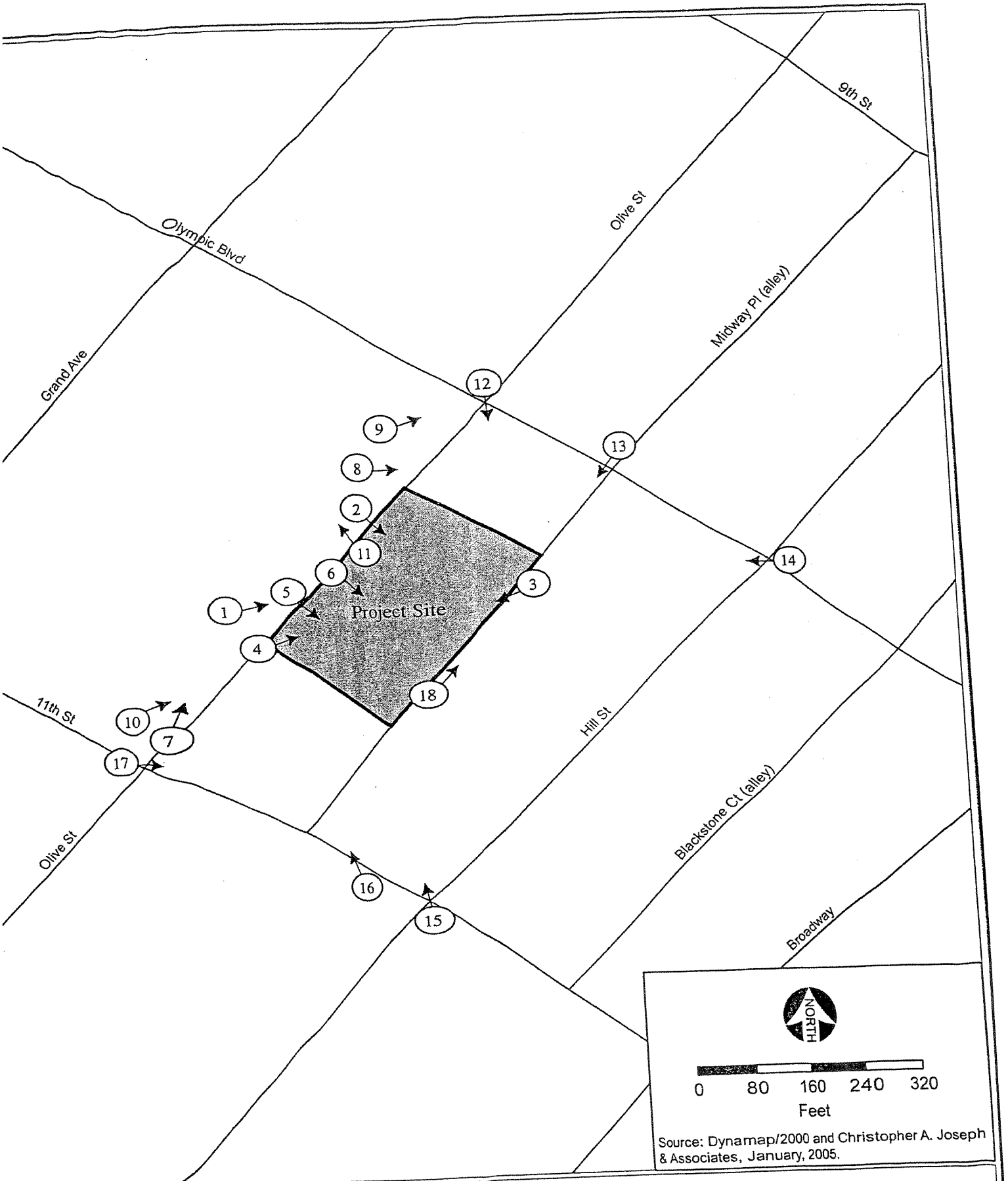

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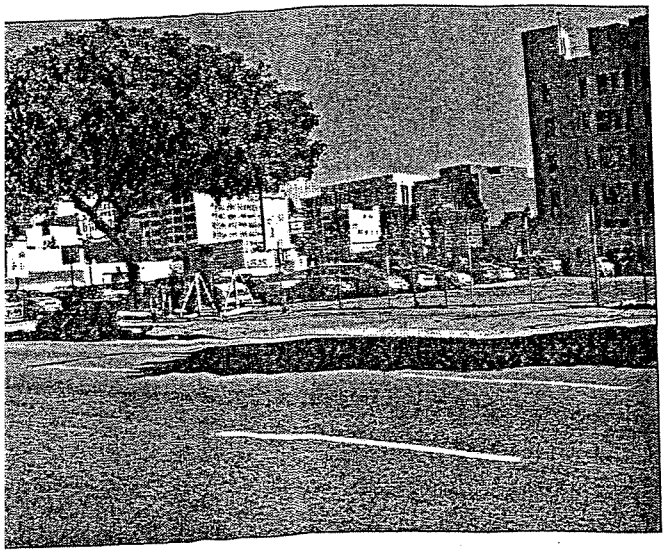
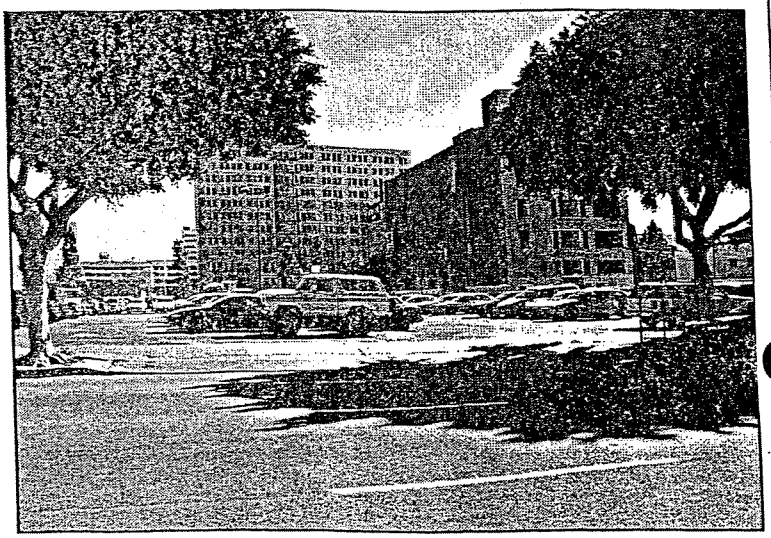
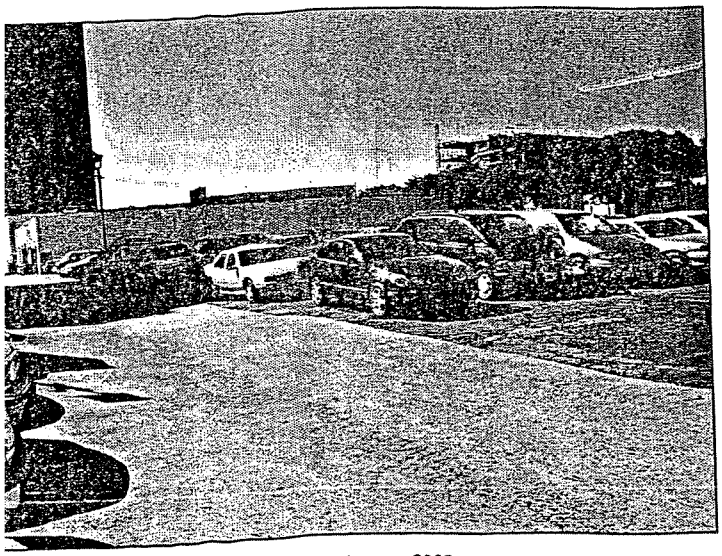
Figure 3
Photograph Location Map



View 1: Looking east across Olive Street towards the western boundary of the project site.



v 2: Looking southeast across Olive Street
ards the project site.



View 3: Looking west across Midway Place towards the eastern boundary of the project site.

e: Christopher A. Joseph & Associates, January 2005.

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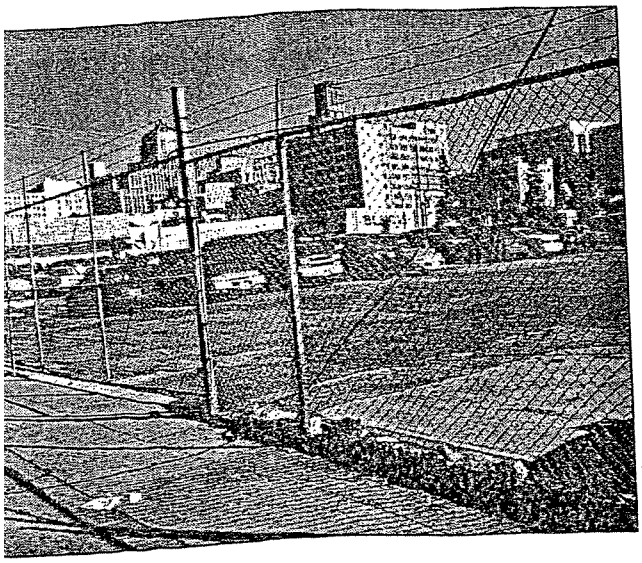
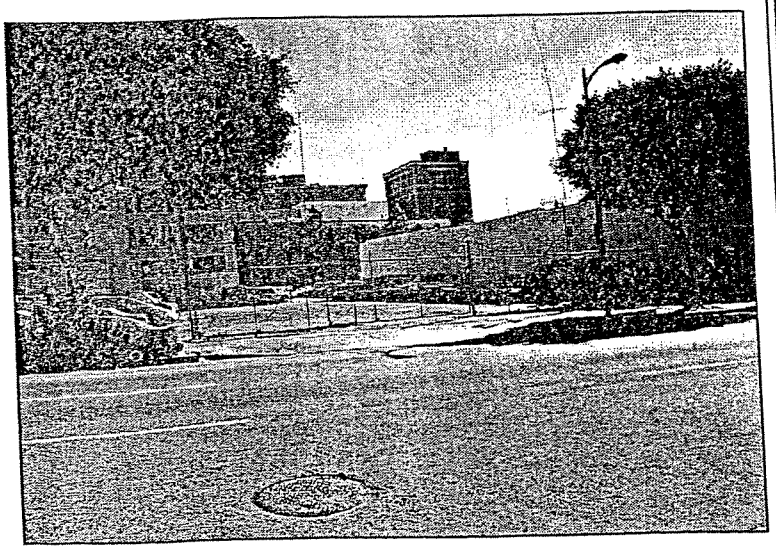
Figure 4
Views of the Project Site
Views 1, 2 and 3



View 4: Looking east from the southwest corner of the project site, towards the project site.

5: Looking southeast across Olive Street
rds the project site.



View 6: Looking southeast across the center of the project site. The existing six-story Los Angeles Job Corps building is in the background.

ce: Christopher A. Joseph & Associates, January 2005.

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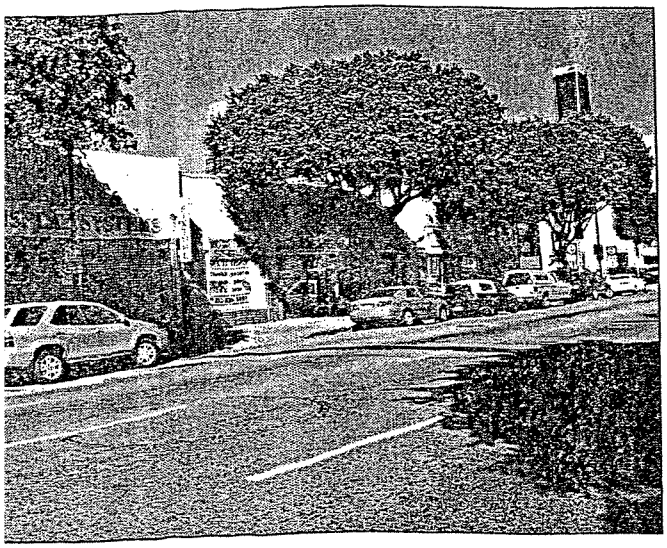
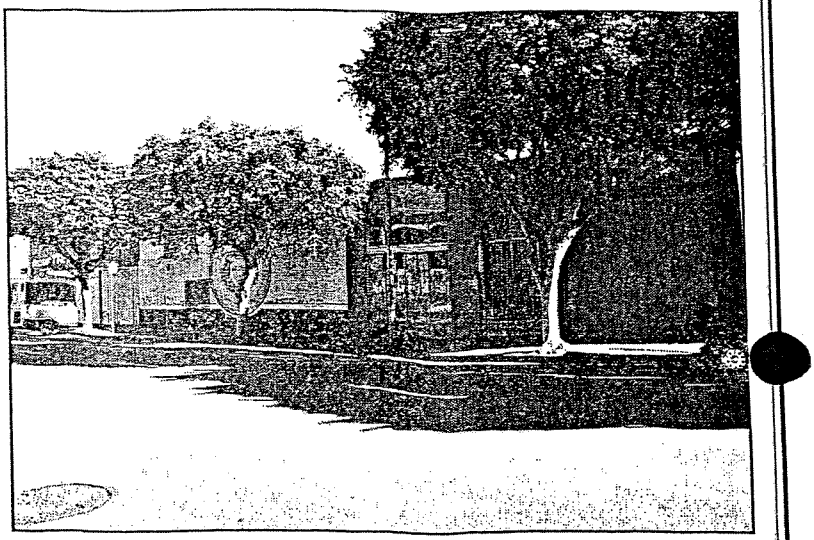
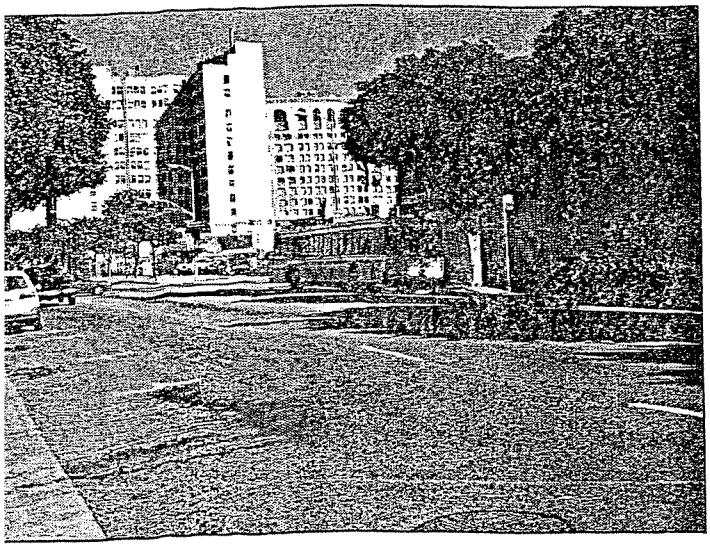
Figure 5
Views of the Project Site
Views 4, 5 and 6



View 7: Looking north across Olive Street near 11th Street towards the single-story commercial uses located west of the project site.

/ 8: Looking east across Olive Street towards /acant buildings and one occupied commercial ness located adjacent to the northern boundary of project site.

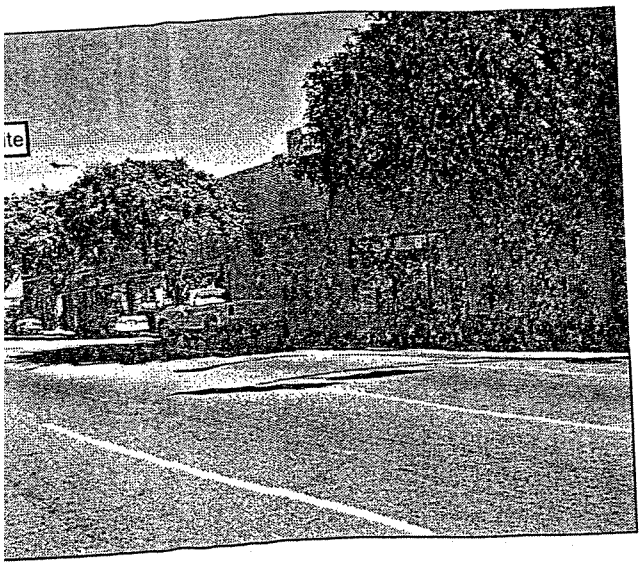




View 9: Looking northeast along Olive Street towards the surrounding commercial and parking uses located north of the project site. Olympic Boulevard can be seen in the background.

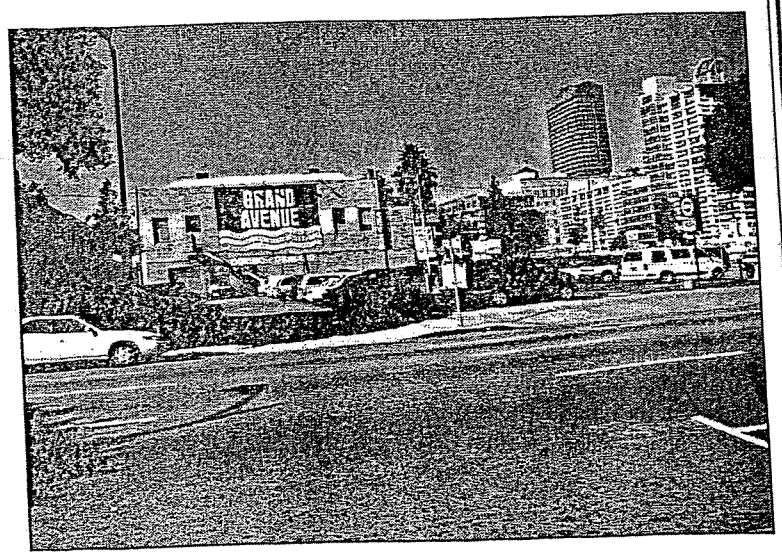
Christopher A. Joseph & Associates, January 2005.

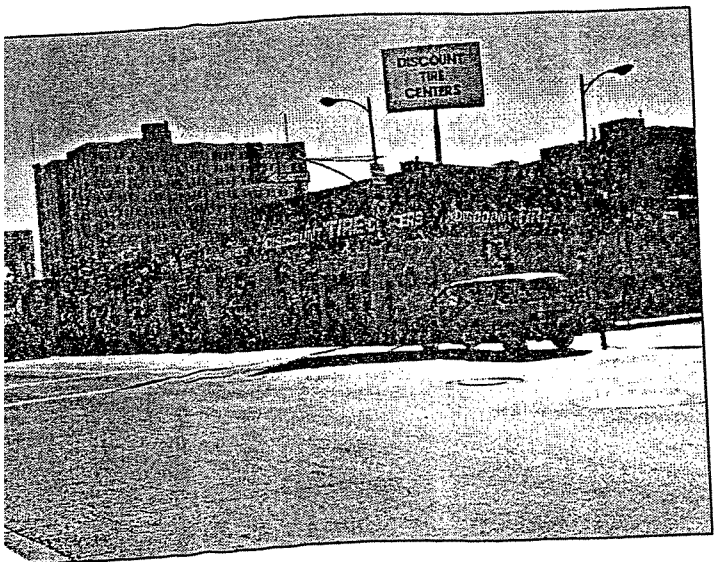
Figure 6
Views of the Surrounding Uses
Views 7, 8 and 9



View 10: Looking northeast across Olive Street near 11th Street towards the single-story commercial uses located adjacent to the southern boundary of the project site.

11: Looking northwest from the center of the ct site across Olive Street towards a surface ing lot and the two-story Grand Avenue Club.





View 12: Looking south from the intersection of Olive Street and Olympic Boulevard towards the Discount Tire Centers business.

rce: Christopher A. Joseph & Associates, January 2005.

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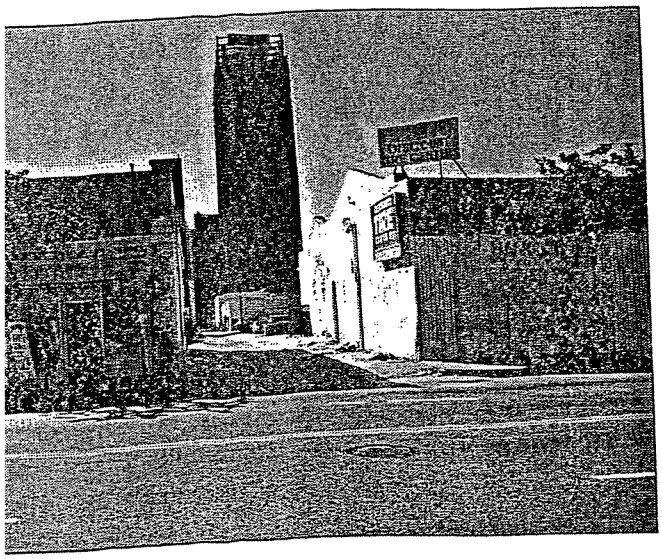
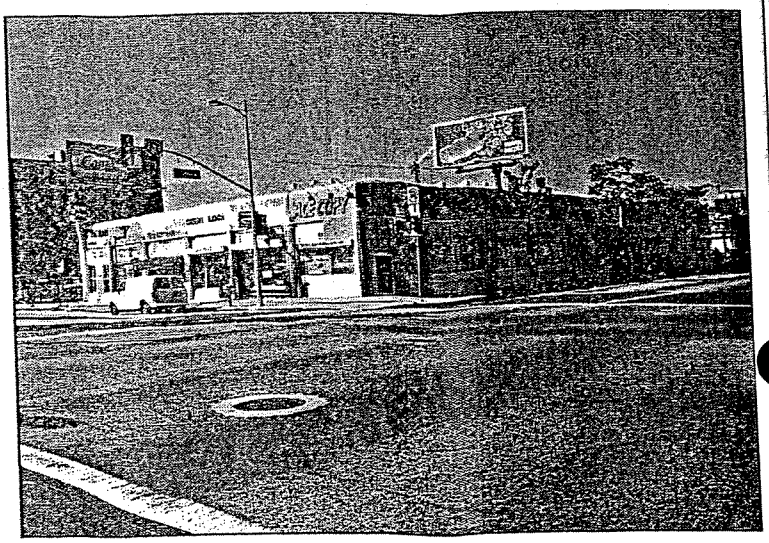
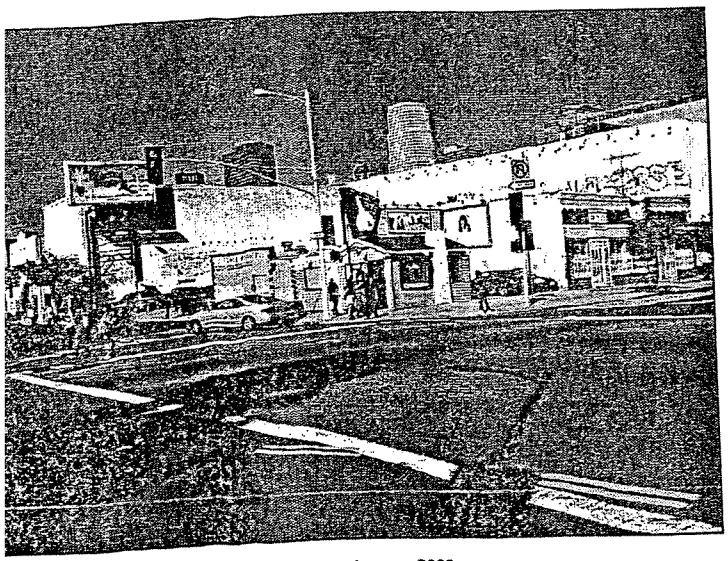
Figure 7
Views of the Surrounding Uses
Views 10, 11 and 12



View 13: Looking southwest across Olympic Boulevard down Midway Place with the Discount Tire Centers to the west (right) and one-story commercial uses to the east (left). The SBC skyscraper can be seen in the background.



14: Looking west from the intersection of ıpic Boulevard and Hill Street towards a single- commercial/retail structure consisting of a ıurant, two clothing stores, psychic reader and ɛr copy business.

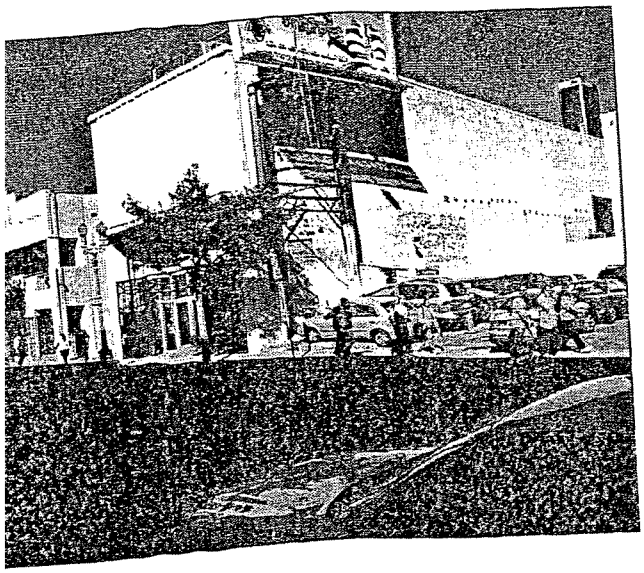


View 15: Looking north from the intersection of Hill Street and 11th Street towards Tony's Burger fast-food restaurant and surrounding commercial/retail uses.

e: Christopher A. Joseph & Associates, January 2005.

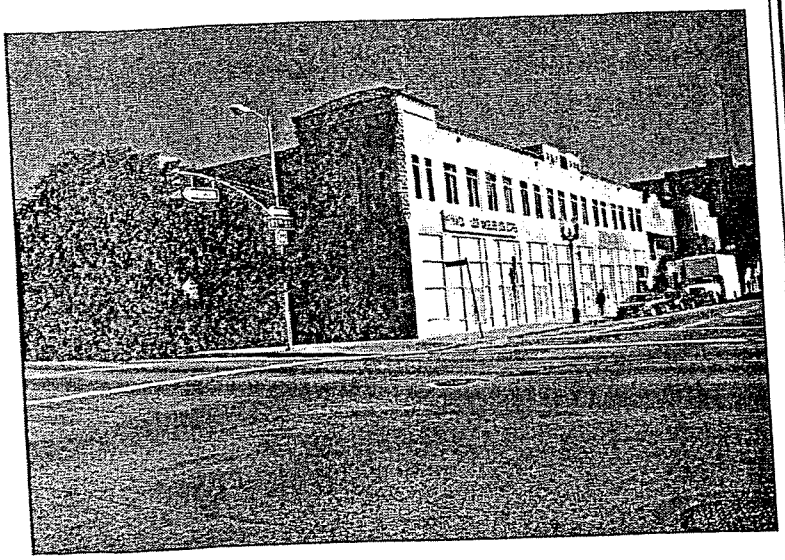
CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

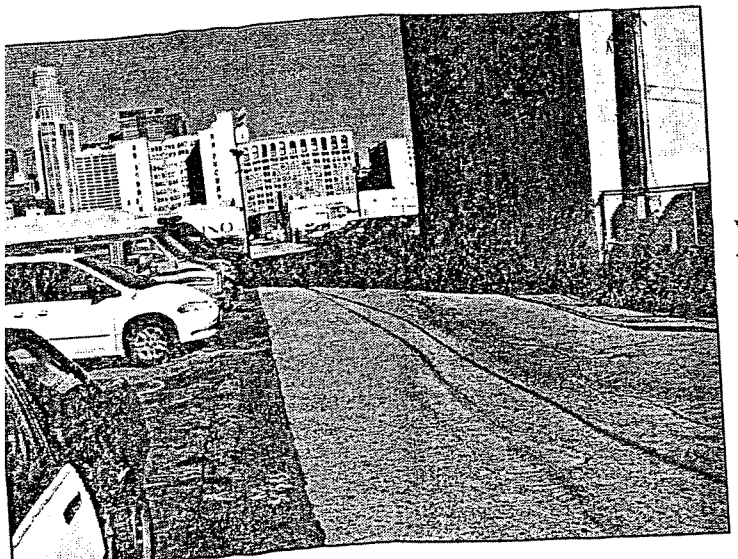
Figure 8
Views of the Surrounding Uses
Views 13, 14 and 15



View 16: Looking north across 11th Street near Hill Street towards the parking lot of Tony's Burger and two, two-story YWCA-Job Corps buildings.

/ 17: Looking east from the intersection of Olive et and 11th Street towards a vacant, two-story CA-Job Corps building.





View 18: Looking northeast along Midway Place. The existing Los Angeles Job Corps building is to the east (right) and the eastern boundary of the project site to the west (left).

ource: Christopher A. Joseph & Associates, January 2005.

CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure 9
Views of the Surrounding Uses
Views 16, 17 and 18

Related Projects

Section 15063(b) of the State CEQA Guidelines provides that Initial Studies consider the environmental effects of a proposed project individually as well as cumulatively. Cumulative impacts are two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts (State CEQA Guidelines Section 15355).

All proposed, recently approved, under construction, and reasonably foreseeable projects that could produce a related cumulative impact on the environment were considered in combination with the proposed project are evaluated throughout Section IV, Environmental Impact Analysis, in this Initial Study.

In coordination with the City of Los Angeles Department of Transportation and the City of Los Angeles Department of City Planning, a list of 35 related projects was developed. These related projects are listed in Table 1 (Related Projects) and shown in Figure 10 (Related Projects Map).

Table 1
Related Projects

Map No.	Location	Land Use	Size
1	730 Olympic Blvd	Fast-food restaurant	2,307 sq. ft.
2	1450 Venice	Junior Market	8,720 sq. ft.
3	Beaudry Ave and 1st St (Belmont Learning Center)	High School	2,600 students
		Office	70,000 sq. ft.
		Park	10.5 acres
4	1st St and Alameda St	Retail/Office	415,782 sq. ft.
		Condominiums	1,154 units
		Hotel	500 rooms
5	Alvarado St and Wilshire Blvd	Grocery Store	40,000 sq. ft.
		Retail	30,000 sq. ft.
		Community Facility	40,000 sq. ft.
6	James M. Wood and Grand View	Affordable Housing	62 units
7	1300 Figueroa St	Apartments	179 units
		Restaurant	8,000 sq. ft.
8	10220 Main St	Retail	32,533 sq. ft.
		Storage	7,909 sq. ft.
9	1050 S. Hill St	Balasco Theatre	33,423 sq. ft.
10	2222 W. Olympic Blvd	California Center Bank	28,800 sq. ft.
11	Figueroa St and 11th Street (Staples Entertainment District)	Hotel	1,200 rooms
		Cinema	3,600 seats
		Theater	7,000 seats
		Restaurant	345,000 sq. ft.
		Retail	498,000 sq. ft.
		Office	165,000 sq. ft.
		Apartments	800 units

Table 1 (continued)
Related Projects

Map No.	Location	Land Use	Size
12	8th St and Francisco St (Metropolis)	Hotel	600 rooms
		Office	1,200,000 sq. ft.
		Retail	223,000 sq. ft.
13	5th St and Bixel St	LA Center Studios Expansion	249,300 sq. ft.
14	400 S. Main St	Restaurant	5,265 sq. ft.
		Bar	215 seats
15	1207 W. 3rd St	Apartments	330 units
		Commercial	50,000 sq. ft.
16	740 S. Broadway	Theater Renovation to Dance Hall	12,500 sq. ft.
17	1630 W. Olympic Blvd	Office	5,432 sq. ft.
		Retail	7,168 sq. ft.
18	1933 Broadway	Commercial	250,000 sq. ft.
19	616 Saint Paul St	Apartments	330 units
		Commercial	10,000 sq. ft.
20	605 Olympic Blvd	Restaurant/Nightclub	7,142 sq. ft.
21	1530 Olive St	Medical Center/Clinic	31,655 sq. ft.
22	1234 Wilshire Blvd	Apartments	210 units
		Retail	12,500 sq. ft.
23	1304 W. 2nd St	Apartments	300 units
24	1100 Wilshire Blvd	Apartments	110 units
		Retail	10,000 sq. ft.
25	2022 Central Ave	Apartments	99 units
		Retail	47,000 sq. ft.
26	257 S. Spring St	Condominiums	50 units
		Retail	18,000 sq. ft.
27	1111 S. Grand Ave	Condominiums	417 units
		Retail	15,000 sq. ft.
28	515 W. 7th St	Restaurant	8,891 sq. ft.
		Bar	7,668 sq. ft.
29	417 S. Hill St	Apartments	277 units
		Retail/Commercial	20,000 sq. ft.
30	816 S. Grand Ave	Condominiums	56 units
31	1201 Flower St	Restaurant	16,200 sq. ft.
		Retail	16,200 sq. ft.
		Student Housing	448 units
32	849 S. Broadway	Live/Work Apartments	147 units
33	1000 S. Hope St	Condominiums	124 units
34	801 S. Grand Ave	Condominiums	132 units
		Commercial	220,000 sq. ft.
35	334 S. Main St	Lofts	400 units
		Retail	165,000 sq. ft.

Source: Facsimile, Ed Chow, Los Angeles Department of Transportation, January 20, 2005; and City of Los Angeles Department of City Planning, Largest Private Sector Projects Being Processed Through the Planning Department: FY 2003-2004.

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Figure 10
Related Projects Location Map

B. PROJECT BACKGROUND

The YWCA of Greater Los Angeles (YWCA/GLA) is a membership organization of women from diverse backgrounds – of different faiths, ages, experiences and ethnic origins – committed to the elimination of racism and to providing services which empower women, develop youth and strengthen families. Their programs target community needs and in 2002, the YWCA/GLA served over 66,000 people.

The Job Corps is administered by the U.S. Department of Labor (DOL) and is a comprehensive residential education and job training program for at-risk youth who are: (1) between 16-24 years of age, (2) low income, and (3) will benefit from the training program. The program includes free vocational training, room and board, free medical and dental care, bi-weekly living allowance, bonuses, transitional pay of up to $1,200, and child care provisions. The YWCA/GLA is the official contractor for DOL's local Job Corps program.

The YWCA/GLA intends to continue its partnership with the DOL Job Corps program with the proposed project, a new satellite urban training and housing facility in Downtown Los Angeles. The proposed project would replicate a traditional college environment, designed specifically for young adults engaged in an active training program that would enable and prepare them to enter the labor force and secure sustainable employment. The proposed project would bring together offsite residents into a new housing complex located adjacent to the existing Job Corps facilities.

C. PROJECT CHARACTERISTICS

The proposed project would involve the development of a seven-story 154,000 gross square foot facility (110,000 net square feet) that would provide housing and dining for 400 students in 200 two-bedroom dormitory-style units. In addition, the U-shaped building would surround an 11,260 square foot courtyard that would contain passive open space and recreational facilities. The proposed project would provide services for non-residents as well as residents, including, healthcare, education, recreation, and counseling. Administrative offices would be located on the top floor and would provide support for the YWCA/Job Corps programs. A summary of the components of the proposed project is provided in Table 2 (Proposed Land Uses).

Table 2
Proposed Land Uses

Land Use	Size
Residential	200 units (47,556 sf)
Kitchen/Dining/Serving	11,088 sf
Storage/Locker Rooms	1,950 sf
Courtyard	11,260 sf
Health Care Facilities (medical and dental)	6,175 sf
Classrooms/Study Areas	5,950 sf
Offices/Ready Rooms/Conference	21,005 sf
Library	1,155 sf
Lounge	5,352 sf
Shop/Utility	9,800 sf
Total	***121,293 sf***

Note: sf = square feet

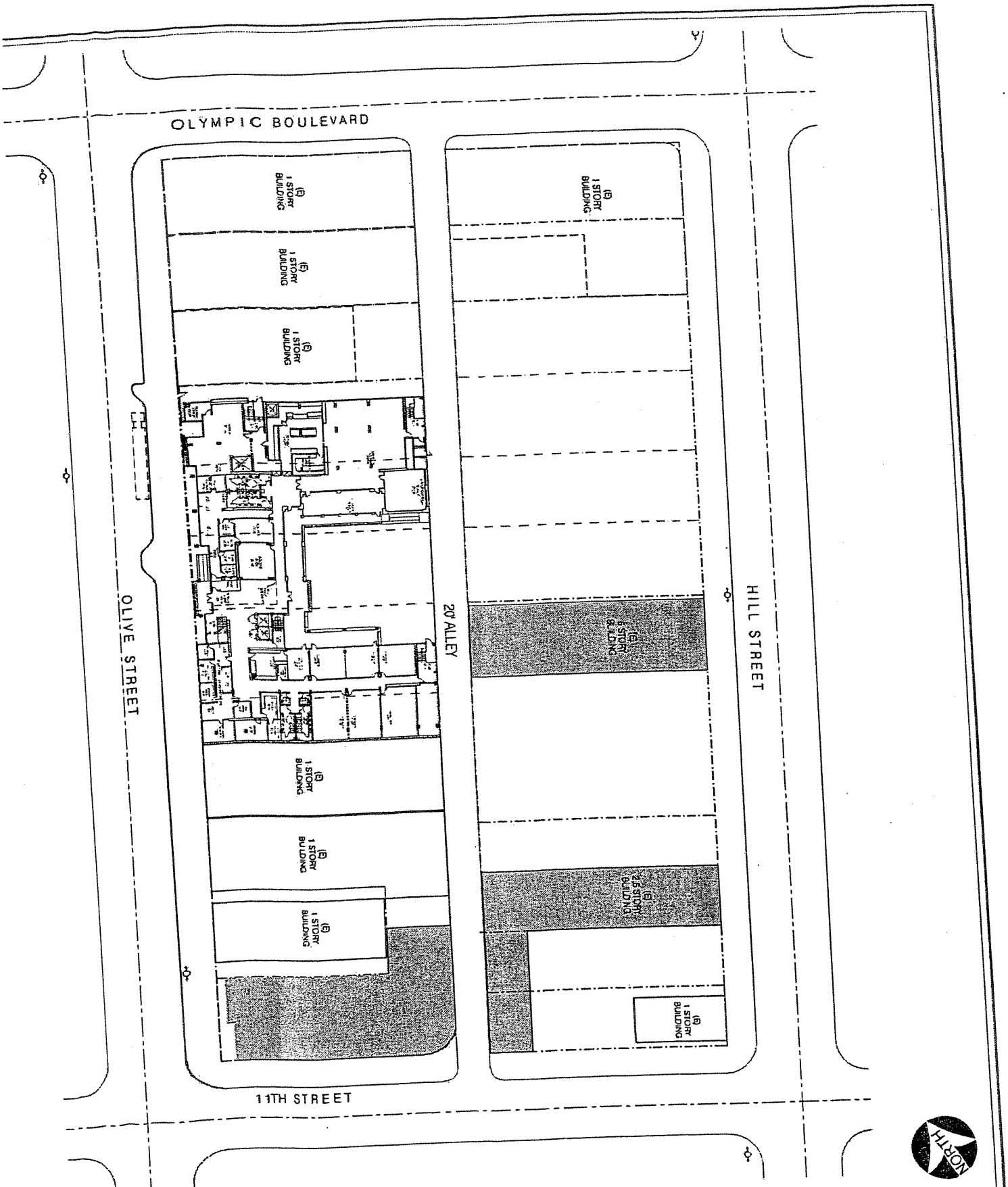
Source: Onyx Architects, January 1, 2005.

The proposed site plan is provided as Figure 11 (Site Plan). In addition, plans for each floor are provided as Figures 12 through 16 (Basement Floor Plan through Seventh Floor Plan).

Open Space/Landscaping

The proposed project would include a landscaped courtyard, which would provide approximately 11,260 square feet of open space. The courtyard would only be accessible to project residents, and would include approximately 5,630 square feet of recreational facilities and approximately 5,630 square feet of passive open space (i.e., grass and trees).

The existing street trees that align Olive Street would remain, with the exception of one tree that would be removed to accommodate the proposed loading area.



: Onyx Architects, January 1, 2005.

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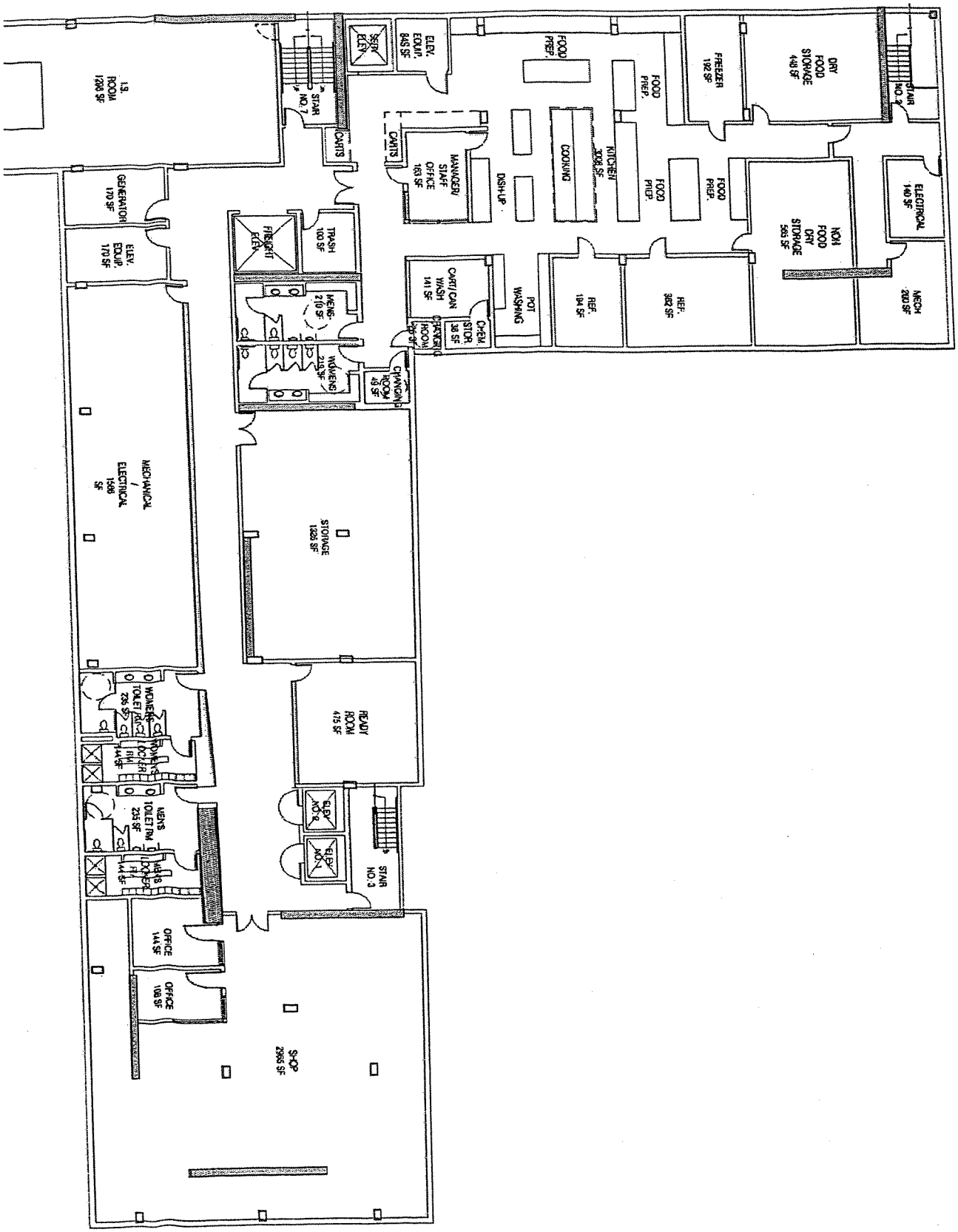
Figure 11
Site Plan



/x Architects, January 1, 2005.

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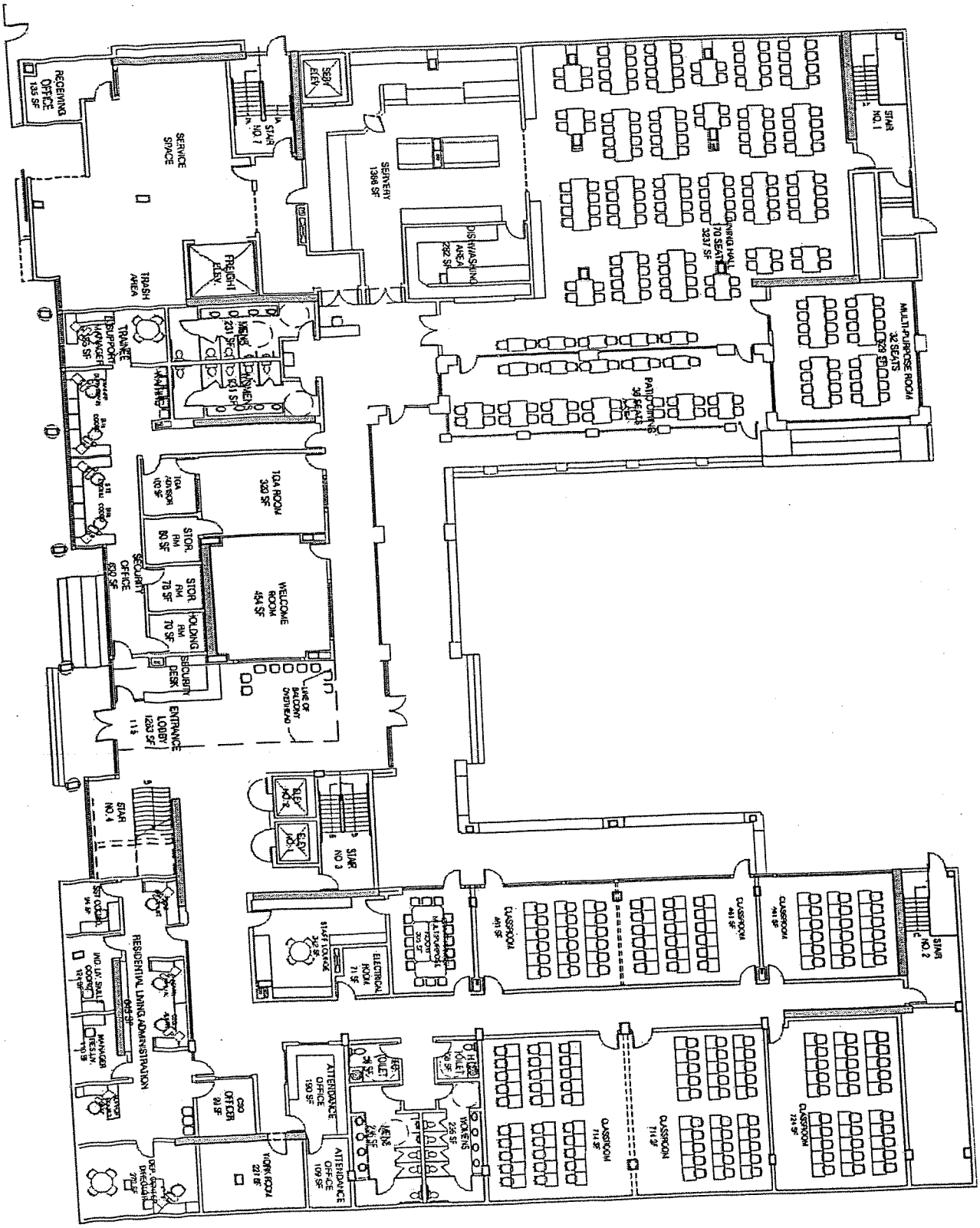
Figure 12
Basement Floor Plan



e: Onyx Architects, January 1, 2005.

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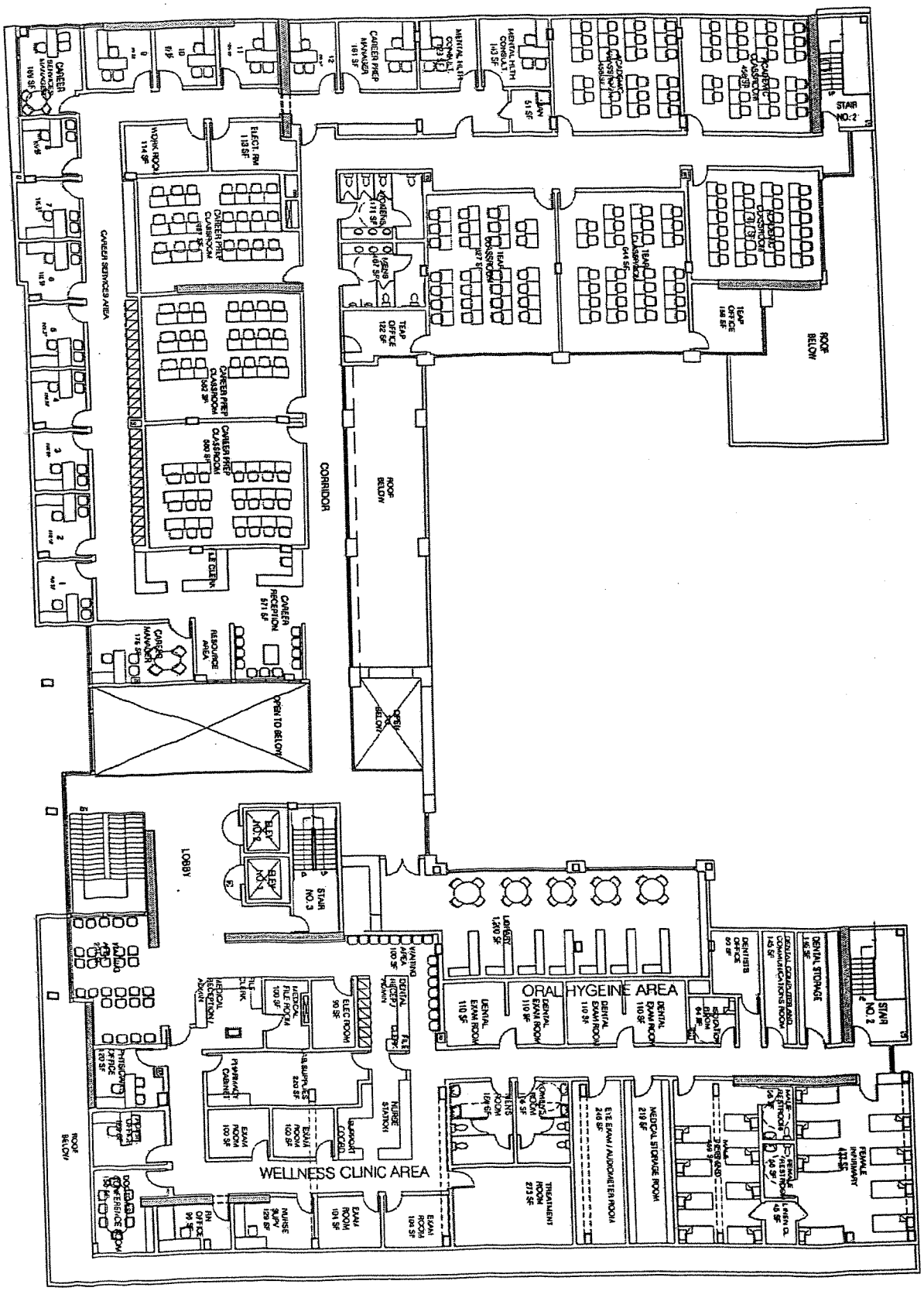
Figure 13
First Floor Plan



Onyx Architects, January 1, 2005.

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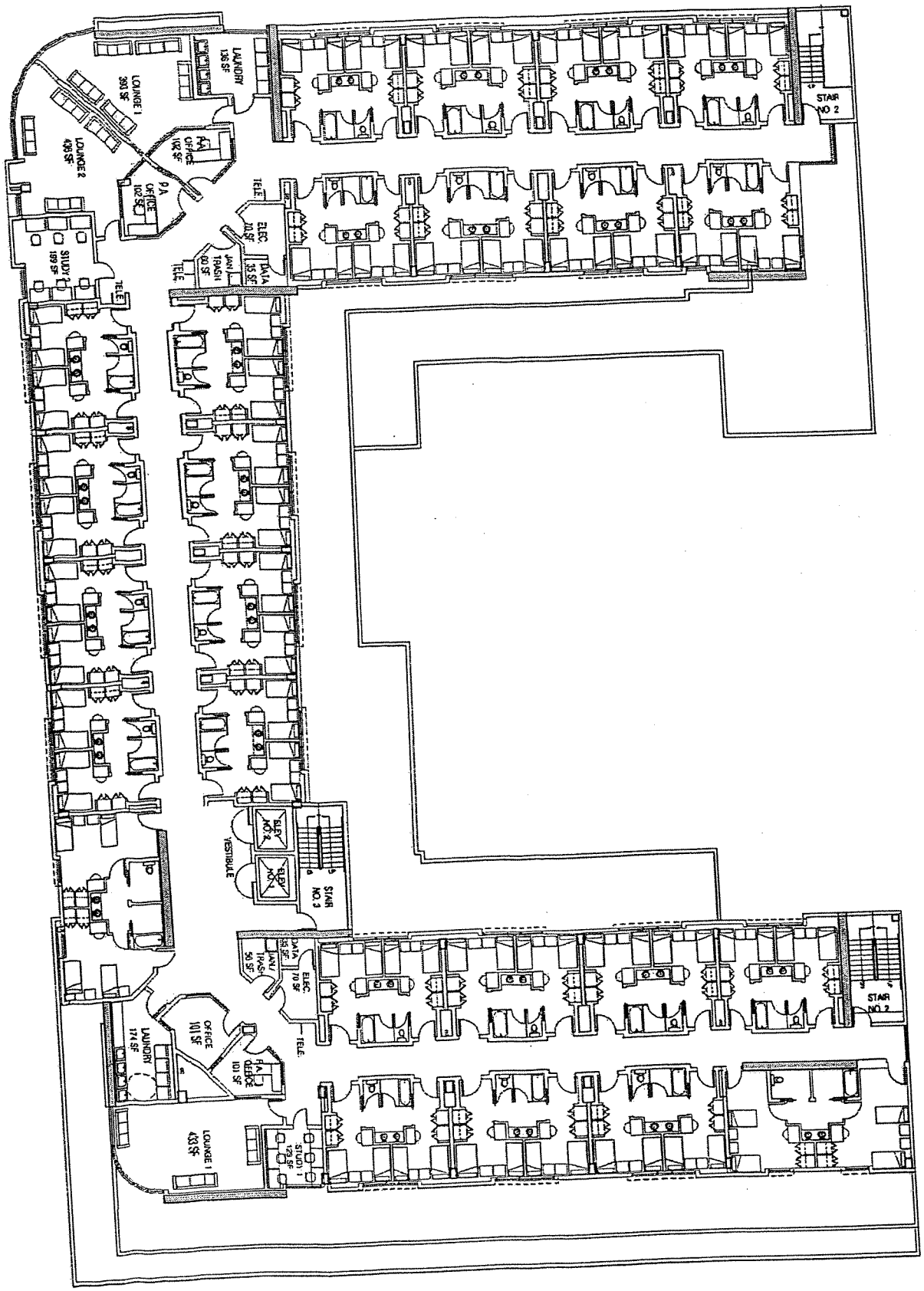
Figure 14
Second Floor Plan



: Onyx Architects, January 1, 2005.

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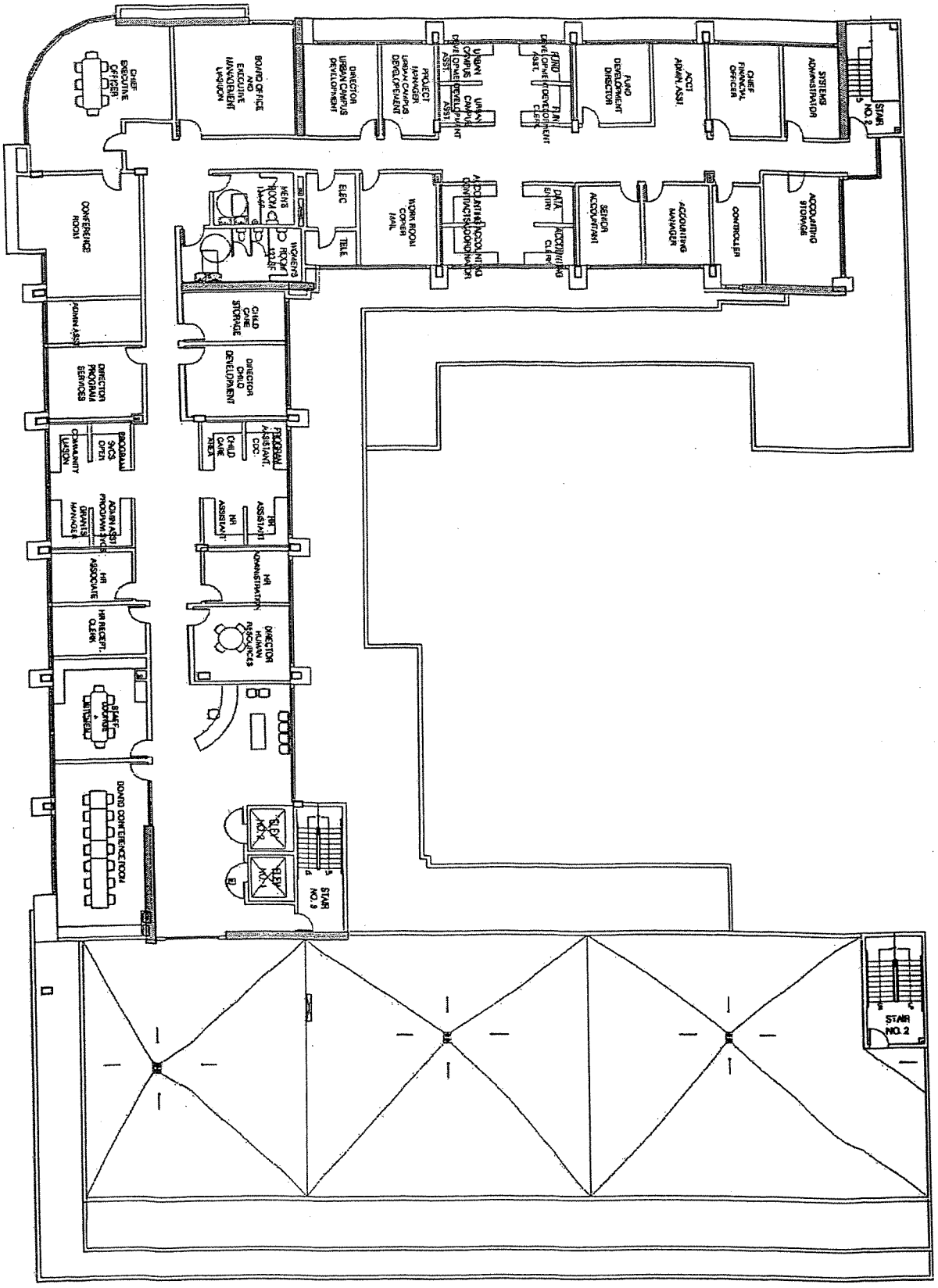
Figure 15
Residential Floor Plan
Floors 3 to 6



yx Architects, January 1, 2005.

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Figure 16
Seventh Floor Plan

Access and Parking

Although regional access to the project site could be provided via the extensive freeway system that encircles Downtown Los Angeles, it is anticipated that the people who would work, live, and/or visit the proposed project would utilize the Metropolitan Transportation Authority (MTA) public transit system. As shown in Figure 17 (Transit System Map), the project site is served by Bus Lines 484, 485, 490, 14, 37, 38, 71, 76, 78, 79, 96, 376, 442, 444, 446, and 447; which all serve the Olive Street/Olympic Boulevard intersection. The proposed project's residents, visitors, and employees could walk approximately 0.8 miles northwest, along Olive Street and 7th Street to the 7th/Metro Rail Center, to access either the Metro Red Line or the Metro Blue Line trains.

Pedestrian access to the project site would be provided from Olive Street. There would only be one main entrance to the proposed building. There would be no public access to the proposed courtyard. A loading area would be provided adjacent to the Service and Delivery Area along Olive Street, at the northern portion of the proposed project.

No onsite parking would be provided with the proposed project. It is anticipated that all of the students that would reside onsite would utilize the surrounding public transit system. The proposed project's employees would either park offsite or use their free transit pass (to be provided by the YWCA) to travel to and from work. As part of the proposed project, a zone variance to reduce the City's parking requirement in the R5 zone is being sought. For a detailed discussion of the required and proposed parking, see the discussion in Question 15(f) in Section IV, Environmental Impact Analysis.

Grading and Construction

Grading and construction of the proposed project would begin in October 2005 and be completed in June 2007. The grading and construction activities would occur in one continuous phase.

Construction of the proposed project would involve the demolition of the existing surface parking lot, excavation and grading, and construction of the proposed facility. Grading would include approximately 15,000 cubic yards of excavation, all of which would be exported offsite. No import material would be needed. In addition, approximately 700 cubic yards of debris would be generated from the demolition of the existing surface parking lot, and approximately 7,600 cubic yards of debris would be generated during construction activities. One ornamental street tree would be removed to accommodate the proposed loading area.

All construction equipment would be staged onsite, when feasible, and on rented offsite space within two miles of the project site.

to Scale

: Metropolitan Transportation Authority, Downtown
ngeles Map, website: http://www.mta.net/riding_metro/system_map/images/downtownla.pdf,
ay 18, 2005.

CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure 17
Transit System Map

D. DISCRETIONARY ACTIONS

mplementation of the proposed project would require the following discretionary actions from the CRA, the City of Los Angeles and other agencies.

- Owner Participation Agreement
- Zone variance for parking reduction
- Site Plan Review findings
- Haul Route Permit

This Initial Study serves as the environmental document for all discretionary actions associated with development of the proposed project. This Initial Study is also intended to cover all federal, State, regional and/or local government discretionary approvals that may be required to develop the proposed project, whether or not they are explicitly listed below. Federal, State, and regional agencies that may have jurisdiction over the proposed project include, but are not limited to:

- Regional Water Quality Board; and
- South Coast Air Quality Management District.

III. INITIAL STUDY CHECKLIST

HE COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES
CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY AND CHECKLIST

e: March 18, 2005

ject Title: YWCA – Job Corps Urban Campus

ject Location: 1016 – 1038 South Olive Street, Los Angeles, California 90015-1602

ject Description: See Section II.

ETERMINATION

n the basis of the attached initial study checklist and evaluation:

— I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described in Section IV have been added to the project. A NEGATIVE DECLARATION WILL BE PREPARED.

— I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

— I find that THERE IS ADDITIONAL INFORMATION for the proposed project with respect to environmental conditions, impacts, mitigation measures or alternatives identified in the prior environmental impact report. Only minor additions or changes will be necessary to make the previous EIR adequately apply to the project in the changed situation and a SUPPLEMENT TO THE EIR will be prepared.

— I find that none of the conditions requiring an additional environmental document have occurred.

Prepared by: Pauline Lewicki

Pauline Lewicki, Principal Planner

VIRONMENTAL IMPACTS (Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
AESTHETICS. Would the project:				
Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?	☐	☐	☐	☒
Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
AGRICULTURAL RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict the existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☒
c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒
3. **AIR QUALITY.** The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project result in:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air	☐	☐	☒	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐
BIOLOGICAL RESOURCES. Would the project:				
Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service ?	☐	☐	☐	☒
Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
i. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	☐	☐	☐	☒
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒
5. **CULTURAL RESOURCES:** Would the project:				
a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA Section 15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA Section 15064.5?	☐	☒	☐	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐
GEOLOGY AND SOILS. Would the project:				
Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving :				
Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
i. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
7. **HAZARDS AND HAZARDOUS MATERIALS.** Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials	☐	☐	☐	☒
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
quarter mile of an existing or proposed school?	☐	☐	☐	☒
Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	☐	☐	☐	☒
Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒
8. **HYDROLOGY AND WATER QUALITY.** Would the proposal result in:				
a. Violate any water quality standards or waste discharge requirements?	☐	☐	☐	☒
b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	☐	☐	☐	☒
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☐	☒
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	☐	☐	☐	☒
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☒	☐	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Otherwise substantially degrade water quality?	☐	☐	☐	☒
Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
Place within a 100-year flood plain structures which would impede or redirect flood flows?	☐	☐	☐	☒
Expose people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☒	☐
Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒
LAND USE AND PLANNING. Would the project:				
Physically divide an established community?	☐	☐	☐	☒
Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒
Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒
10. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐
b) Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☒	☐
11. NOISE. Would the project:				
a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d. A substantial temporary or periodic increase in ambient	☐	☐	☒	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
POPULATION AND HOUSING. Would the project:				
Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
13. **PUBLIC SERVICES.** Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☐	☒
14. **RECREATION.**				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐
TRANSPORTATION/TRAFFIC. Would the project:				
Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to ratio capacity on roads, or congestion at intersections)?	☐	☐	☒	☐
Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e. Result in inadequate emergency access?	☐	☐	☐	☒
f. Result in inadequate parking capacity?	☐	☐	☒	☐
g. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	☐	☐	☐	☒
16. UTILITIES. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☒	☐	☐
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?	☐	☐	☒	☐
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in	☐	☐	☒	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
addition to the provider's existing commitments?	☐	☐	☒	☐
Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	☒
Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒
MANDATORY FINDINGS OF SIGNIFICANCE.				
Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
Does the project have impacts which are individually limited, but cumulatively considerable?("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	☐	☒	☐	☐
Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?				

DISCUSSION OF THE ENVIRONMENTAL EVALUATION (Attach additional sheets if necessary)

PREPARED BY	TITLE	TELEPHONE	DATE

IV. ENVIRONMENTAL IMPACT ANALYSIS

AESTHETICS

a) Would the project have a substantial adverse effect on a scenic vista?

No Impact. A significant impact would occur if a proposed project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks a scenic vista. There are no scenic vistas to the north, south, east, or west of the project site. Views in the vicinity of the project site are largely constrained by adjacent structures and the area's relatively flat topography. The project site is surrounded by dense urban development, consisting of commercial buildings and surface parking lots. The proposed project would be consistent with the existing uses in the project vicinity. Therefore, no impact to scenic vistas would occur.

b) **Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?**

No Impact. A significant impact would occur only where scenic resources would be damaged or removed by the project. The project site is located in a dense urban area that is dominated by commercial and parking uses. As discussed above in Question 1(a), no scenic resources currently exist in this area. No rock outcroppings exist on the project site. The only trees that exist on the project site are ornamental, and are generally located along the sidewalks aligning Olive Street. One of these trees would be removed during the development of the proposed project. Furthermore, the proposed project is not located within or near a State Scenic Highway[1] or City-designated Scenic Highway.[2] Therefore, no impact to scenic resources within a scenic highway would occur.

c) **Would the project substantially degrade the existing visual character or quality of the site and its surroundings?**

Less Than Significant Impact. A significant impact may occur if a project introduces incompatible visual elements on the project site or visual elements that would be incompatible with the character of the area surrounding the project site. The project site is a paved surface parking lot that is located within a dense urban area of Downtown Los Angeles. Therefore, the visual environment of the project

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1 *California Department of Transportation, California Scenic Highway Program, website: http://www.dot.ca.gov/hq/LandArch/scenic_highways/langeles.htm, January 19, 2005.*

2 *City of Los Angeles, Transportation Element of the General Plan, Scenic Highways in the City of Los Angeles, Map E, June 1998.*

site is dominated and defined by urban features including high-rise commercial buildings, multi-family residential buildings, and parking lots. The existing Project Site is visible from the surrounding roadways, adjacent commercial and residential buildings, and parking lots. Development of the proposed project would include the construction of a seven-story U-shaped building.

Heights and Massing

The proposed building would consist of seven stories and reach a height of approximately 90 feet. The proposed building would be U-shaped with a courtyard in the interior of the site. The proposed project's frontage along Olive Street is shown in Figure 18 (Proposed Project Artistic Rendering). However, although they are not shown in Figure 18, the existing ornamental trees along Olive Street would not be removed (with the exception of one tree, as discussed below). The entrance to the project site would be recessed and shaded.

The existing buildings surrounding the project site range in height from one to seven stories. The existing vacant commercial buildings northeast of the project site along Olive Street are one story high (see View 8 in Figure 6). The existing vacant commercial buildings southwest of the project site along Olive Street are also one story high (see View 10 in Figure 7). The existing YWCA Job Corps building is adjacent to the southeast boundary of the project site, and is six stories high. Surface parking lots are located both north and south of this existing six-story building, adjacent to the southeastern boundary of the project site.

The occupied commercial buildings on the west side of Olive Street, directly across from the project site, are also one story high (see View 7 in Figure 6). The property to the northwest of the project site, across Olive Street, is occupied by a surface parking lot.

In addition to the existing YWCA Job Corps building mentioned above, other buildings that are six stories or higher in close proximity to the project site include: a six-story commercial building on the northwest corner of Olive Street and Olympic Boulevard; and a seven-story condominium building that is under construction on the southwest corner of Olive Street and Olympic Boulevard. Furthermore, several skyscrapers that characterize the image of Downtown Los Angeles can be seen from any vantage point on the project site.

Therefore, the proposed height and massing of the proposed project would be generally consistent with the existing buildings in the project site vicinity.

Source: Onyx Architects, January 1, 2005.

Figure 18
Proposed Project Artistic Rendering

CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Landscaping

Currently, the only vegetation in the vicinity of the project site is existing ornamental street trees along both sides of Olive Street (see Figure 2). With the development of the proposed project, one of the street trees along Olive Street would be removed to accommodate the proposed loading area. Although the curb, gutter, and sidewalk along Olive Street would be improved with the development of the proposed project, no additional trees would be removed. In the interior of the project site, the proposed courtyard would be landscaped with grass and trees.

Overall, the visual character of the project site and its surroundings would improve with the development of the proposed project and, therefore, the associated impact would be less than significant.

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. A significant impact may occur if a project introduces new sources of light or glare on the project site which would be incompatible with the areas surrounding the project site or which pose a safety hazard, such as to motorists utilizing adjacent streets.

Urban Lighting

The project site is located in a well-lit urban area where there are high levels of ambient lighting, including vehicle headlights, streetlights, architectural and security lighting, and indoor building illumination (light from the interior of buildings seen through windows).

The proposed project would include security lighting to deter criminal activity from the project site. The lighting associated with the proposed project would be directed towards the interior of the project site and directed away from the neighboring land uses. The proposed building would not cause excessive light or glare that is not visually consistent with surrounding land uses, or result in a substantial increase in light or glare that would affect sensitive nearby uses. Therefore, the impact associated with light or glare would be less than significant.

Shade/Shadow

The City of Los Angeles also considers the effects of shadows cast upon adjacent structures containing uses that are sensitive to shadows. Uses that are sensitive to shadows include: useable outdoor spaces associated with residential, recreational, or institutional uses; commercial uses with pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and solar collectors. However, no shadow-sensitive uses are adjacent to the project site. As discussed in Section II.A, the structures surrounding the project site are occupied by commercial uses, vacant commercial structures, and

surface parking lots. The nearest sensitive use to the project site is the seven-story multi-family residential building that is under construction at the southwest corner of 11th Street and Olive Street. However, this multi-family residential building is located approximately 290 feet southwest of the project site, which is a considerable distance from the potential shadow of the proposed project. Therefore, the impact associated with shade/shadow would be less than significant.

Cumulative Impacts

Less Than Significant Impact. According to the Draft Los Angeles CEQA Thresholds Guide, a significant cumulative aesthetic impact would occur if any of the related projects would "result in the removal, alteration, or destruction of similar aesthetic features as the proposed project, and/or would add structural or other features that would contrast conspicuously with the valued aesthetic character of the same area as the project."[3] Currently, a paved surface parking lot occupies the project site. The parking lot is not considered to have aesthetic value. It is likely that several of the related projects in Downtown Los Angeles would also be developed on surface parking lots. However, since surface parking lots are not considered to be valuable aesthetic features, the cumulative effect of their removal would not result in a significant impact.

With respect to the cumulative effect of the addition of structural features in the project vicinity, Related Project No. 9 is the only related project that can be easily seen from the project site (see Figure 10). Related Project No. 9 is the redevelopment of a theater, which does not include substantial alteration to the existing structure. Therefore, the cumulative aesthetic effect of the development of the related projects and the proposed project would be less than significant.

2. AGRICULTURE

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. A significant impact may occur if a project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland". The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the

[3] *City of Los Angeles, Draft CEQA Thresholds Guide, May 14, 1998, page L.1-5.*

project site is not included in the Important Farmland category.[4] The project site is located in the heavily developed area of Downtown Los Angeles and does not include any State-designated agricultural lands. Therefore, no impact on farmland or agricultural resources would occur.

b) **Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract?**

No Impact. A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act contract from agricultural use to another non-agricultural use. The project site is not currently zoned for agricultural use nor would the proposed project involve the conversion of agricultural land to another use. Therefore, the proposed project would have no impact associated with land zoned for agricultural use.

c) **Would the project involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland, to non-agricultural use?**

No Impact. A significant impact may occur if a project results in the conversion of farmland to another, non-agricultural use. Neither the project site nor the nearby properties are currently utilized for agricultural activities and, as discussed above (see Question 2(a)), the project site is not classified in any "Farmland" category designated by the State. Therefore, the proposed project would have no impact associated with the conversion of farmland.

Cumulative Impacts

No Impact. Development of the proposed project in combination with the related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use. The project site and the related projects are located in a dense urbanized area of the City and do not include any State-designated agricultural lands. Furthermore, the Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the project site and the surrounding area are not included in the Important Farmland category.[5] Therefore, the proposed project in combination with the related projects would have no impact associated with the conversion of farmland.

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[4] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, website: http://www.consrv.ca.gov/dlrp/FMMP/overview/survey_area_map.htm, January 18, 2005.*

[5] *Ibid.*

). AIR QUALITY

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. A significant air quality impact may occur if a project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan.

The proposed project is located within the South Coast Air Basin (Basin), within the jurisdiction of the South Coast Air Management District (SCAQMD). The SCAQMD has adopted criteria for consistency with regional plans and the regional AQMP in its CEQA Air Quality Handbook. These include: 1) identifying whether the project would increase the frequency or severity of existing air quality violations or cause or contribute to new air quality violations and 2) identifying whether the project would exceed the assumptions utilized in preparing the AQMP. A significant impact may occur if a project is inconsistent with the growth assumptions upon which the regional AQMP was based.

The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources. Every three years, the SCAQMD prepares an overall plan for air quality improvement. Each iteration of the plan is an update of the previous plan and has a 20-year horizon. The Final 2003 AQMP was adopted by the SCAQMD Governing Board on August 1, 2003. The 2003 AQMP updates the attainment demonstration for the federal standards for ozone and particulate matter (PM_{10}); replaces the 1997 attainment demonstration for the federal carbon monoxide (CO) standard, provides a basis for a maintenance plan for CO for the future; and updates the maintenance plan for the federal nitrogen dioxide (NO_2) standard that the Basin has met since 1992. This revision to the AQMP also addresses several State and federal planning requirements and incorporates significant new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new meteorological episodes and new air quality modeling tools. The 2003 AQMP is consistent with and builds upon the approaches taken in the 1997 AQMP and the 1999 Amendments to the Ozone State Implementation Plan for the South Coast Air Basin for the attainment of the federal ozone air quality standard.

Principal control measures of the AQMP focus on adoption of new regulations or enhancement of existing regulations for stationary sources and implementation/facilitation of advanced transportation technologies (i.e., telecommunication, zero emission and alternative-fueled vehicles and infrastructure, and both capital and noncapital transportation improvements). Capital improvements consist of high-occupancy vehicle (HOV) lanes; transit improvements; traffic flow improvements; park-and-ride and intermodal facilities; and urban freeway, bicycle, and pedestrian facilities. Noncapital improvements consist of rideshare matching and transportation demand management activities derived from the congestion management program.

The future air quality levels projected in the 2003 AQMP are based on several assumptions. For example, the SCAQMD assumes that general new development within the Basin will occur in accordance with population growth and transportation projections identified by SCAG in its most current version of the Regional Comprehensive Plan and Guide (RCPG), which was adopted in March 1996. The AQMP also assumes that general development projects will include feasible strategies (i.e., mitigation measures) to reduce emissions generated during construction and operation.

In developing the 2003 AQMP, the City of Los Angeles General Plan land use designations were used to develop a baseline for comparing any changes in land use due to new projects. As discussed above, the proposed project would involve the development of a seven-story 154,000 gross square foot facility (110,000 net square feet) that would provide housing and dining for 400 students in 200 two-bedroom dormitory-style units. However, the General Plan land use designation and zoning would not change and, therefore, this aspect of the proposed project is consistent with the AQMP.

Another measurement tool use in determining consistency with the AQMP is to determine how a project accommodates the expected increase in population or employment. Generally, if a project is planned in a way that results in the minimization of Vehicle Miles Traveled (VMT) both within the project and the community in which it is located, and consequently the minimization of air pollutant emissions, that aspect of the project is consistent with the AQMP.

Primary access to the project site could be provided via the extensive freeway system that encircles Downtown Los Angeles. However, it is anticipated that the people who would work, live, and/or visit the proposed project would utilize the Metropolitan Transportation Authority (MTA) public transit system and would therefore not result in an increase in VMT. As discussed above, any project that reduces the amount of VMT is considered consistent with the AQMP. Therefore, the proposed project would be consistent with the AQMP and would result in a less-than-significant impact.

b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. A project may have a significant impact where project-related emissions would exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. The proposed project is located in an existing urban environment within close proximity to residential and school uses. Residential and school uses are considered sensitive receptors, whose inhabitants are particularly sensitive to air pollution created by construction and operational activities.

During construction, three basic types of activities would be expected to occur and generate emissions. First, the existing surface parking lot would be removed. Second, the development site would be

repared, excavated, and graded to accommodate building foundations. Third, the proposed project use would be constructed.

The analysis of daily construction and operational emissions has been prepared utilizing the URBEMIS 2002 computer model recommended by the SCAQMD. Due to the construction time frame and the normal day-to-day variability in construction activities, it is difficult, if not impossible, to precisely quantify the daily emissions associated with each phase of the proposed construction activities. Nonetheless, Table 3 (Worst-Case Estimated Daily Construction Emissions for the Proposed Project) identifies daily emissions that are estimated to occur on peak construction days, such as when the entire site is being graded and when residential and commercial construction is occurring simultaneously. As shown, construction related daily emissions would not exceed SCAQMD significance thresholds.

Table 3
Worst-Case Estimated Daily Construction Emissions for the Proposed Project

Emissions Source	Peak Day Emissions in Pounds per Day				
	ROG	NOx	CO	SOx	PM10
Site Excavation and Grading Phase					
Fugitive Dust	-	-	-	-	5.00
Off-Road Diesel	4.31	36.05	29.50	-	1.68
On-Road Diesel	0.46	10.43	1.73	0.14	0.25
Worker Trips	0.04	0.07	0.79	0.00	0.00
Total Emissions	***4.81***	***46.55***	***32.02***	***0.14***	***6.93***
SCAQMD Thresholds	75.0	100.0	550.0	150.0	150.0
Significant Impact?	NO	NO	NO	NO	NO
Construction Phase					
Building Construction Off-Road Diesel	11.25	88.50	81.19	-	4.04
Building Construction Worker Trips	0.31	0.18	3.76	0.00	0.05
Arch. Coatings Off-Gas	64.75	-	-	-	-
Arch. Coatings Worker Trips	0.31	0.18	3.76	0.00	0.05
Asphalt Off-Gas	0.00	-	-	-	-
Asphalt Off-Road Diesel	0.00	0.00	0.00	0.00	0.00
Asphalt On-Road Diesel	0.00	0.00	0.00	0.00	0.00
Asphalt Worker Trips	0.00	0.00	0.00	0.00	0.00
Total Emissions	***65.06***	***88.67***	***84.96***	***0.00***	***4.10***
SCAQMD Thresholds	75.0	100.0	550.0	150.0	150.0
Significant Impact?	NO	NO	NO	NO	NO

Source: Urbemis 2002. Christopher A. Joseph & Associates, 2005. Calculation sheets are provided in Appendix B.

However, even though the proposed project would not result in construction related emission levels which exceed the SCAQMD thresholds, the proposed project would be subject to the provisions of SCAQMD Rule 403-Fugitive Dust. Rule 403 applies to any activity or man-made condition capable of generating fugitive dust. Rule 403 requires the use of best available control measures to suppress fugitive dust emissions. The requirements of Rule 403 that are applicable to the Proposed Project are as follows:

(1) A person shall not cause or allow the emissions of fugitive dust from any active operation, open storage pile, or disturbed surface area such that the presence of such dust remains visible in the atmosphere beyond the property line of the emission source.

(2) A person conducting active operations within the boundaries of the South Coast Air Basin shall utilize one or more of the applicable best available control measures to minimize fugitive dust emissions from each fugitive dust source type, which is part of the active operation.

(3) Any person in the South Coast Air Basin shall:

(A) Prevent or remove within one hour the track-out of bulk material onto public paved roadways as a result of their operations; or

(B) Take at least one of the actions listed in Table 4 (SCAQMD Rule 403 - Track-Out Control Options) and:

(i) Prevent the track-out of bulk material onto public paved roadways as a result of their operations and remove such material at anytime track-out extends for a cumulative distance of greater than 50 feet on to any paved public road during active operations; and

(ii) Remove all visible roadway dust tracked-out upon public paved roadways as a result of active operations at the conclusion of each work day when active operations cease.

As such, construction emissions would result in a less-than-significant regional air quality impact.

Table 4
SCAQMD Rule 403 – Track-Out Control Options

	Control Options
(1)	Pave or apply chemical stabilization and sufficient concentration and frequency to maintain a stabilized surface starting from the point of intersection with the public paved surface, and extending for a centerline distance of at least 100 feet and a width of at least 20 feet.
(2)	Pave from the point of intersection with the public paved road surface, and extending for a centerline distance of at least 25 feet and a width of at least 20 feet, and install a track-out control device immediately adjacent to the paved surface such that existing vehicles do not travel on any unpaved road surface after passing through the track-out control device.
(3)	Any other control measures approved by the Executive Officer and the USEPA as equivalent to the methods specified in this table may be used.

Source: South Coast Air Quality Management District, Rule 403 – Fugitive Dust.

c) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative threshold for ozone precursors)?

Less Than Significant Impact. A significant impact may occur if the project would add a considerable cumulative contribution to federal or State non-attainment pollutants. The proposed project is designed with the notion that the individuals utilizing the services of the proposed project would travel to and from the site via public transportation and/or on foot. The employees that would be working at the proposed project would be relocated from the existing YWCAs in downtown, midtown and Hollywood. However, it is anticipated that many of them would chose to utilize the public transit system rather than driving to and from work (see also response to Question 15(a)). Therefore, the primary source criteria pollutants, which are generated by the use of motor vehicles, for which the region is non-attainment would not be produced. Nonetheless, the operation of the proposed project site would contribute small amount of pollutants to the region. The analysis of daily operational emissions has been prepared utilizing the URBEMIS 2002 computer model recommended by the SCAQMD. The results of these calculations, and associated SCAQMD thresholds, are presented in Table 5 (Project Daily Operational Emissions). These pollutant emissions would not exceed threshold defined by the SCAQMD.

Table 5
Project Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day				
	ROG	NO_x	CO	SO_x	PM_{10}
Water and Space Heating	0.11	1.49	0.60	-	0.00
Landscape Maintenance	0.08	0.01	0.58	0.00	0.00
Consumer Products	0.00	-	-	-	-
Motor Vehicles	0.00	0.00	0.00	0.00	0.00
Total Emissions	0.19	1.50	1.18	0.00	0.00
Thresholds (lb/day)	***55.0***	***55.0***	***550.0***	***150.0***	***150.0***
Significant Impact	NO	NO	NO	NO	NO

Source: Urbemis 2002. Christopher A. Joseph & Associates, 2004. Computer sheets are provided in Appendix B.

d) **Would the project expose sensitive receptors to substantial pollutant concentrations?**

Less Than Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Motor vehicles are the primary source of pollutants in the project vicinity. Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed federal and/or State standards for CO are termed CO hotspots. Section 9.4 of the SCAQMD's CEQA Air Quality Handbook identifies CO as a localized problem requiring additional analysis when a project is likely to subject sensitive receptors to CO hotspots. The SCAQMD defines typical sensitive receptors as residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

However, as described above, the proposed project would not result in the creation of any new vehicle trips to the surrounding roadways and intersections. Therefore, air pollutants emissions associated with the proposed project would only be generated by the consumption of electricity and natural gas and would be considered a stationary operational emission. The results, shown in Table 5, indicate that the Proposed Project does not exceed the SCAQMD significance thresholds for ROG, NO_x, CO, SO_x and PM_{10}. Therefore, as shown, this impact would be less than significant.

e) **Would the project create objectionable odors affecting a substantial number of people?**

Less Than Significant Impact. A significant impact may occur if objectionable odors occur which would adversely impact sensitive receptors. Odors are typically associated with the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. Odors related to any potential kitchen use may result. However, these odors would be considered consistent with odors generated in the vicinity due to existing restaurants in the area and would be result

ı a less-than-significant impact. Therefore, impacts associated with objectionable odors would be less han significant.

Cumulative Impacts

Construction Impacts

Less Than Significant Impact. The City has identified 35 related projects within 1.5 miles of the proposed project. Construction of these projects could result in cumulative impacts on local air quality, particularly fugitive dust impacts, if all were constructed simultaneously. However, because the nearest related project (Related Project No. 27), located at the intersection of Olive Street and 11th Street, is nearing completion and the proposed project is located on a relatively small parcel, it is very unlikely that the local area would experience cumulative impacts from the two projects - even if both were under construction at the same time. Also, as with operational emissions, the adopted AQMP projects construction-related regional emissions for the population growth anticipated through 2025 and includes control measures to offset the increase in regional emissions that would result from construction activities. Therefore, the proposed project would have a less-than-significant cumulative construction-related impact on air quality.

Regional Operational Impacts

Less Than Significant Impact. The 2003 AQMP is based on population growth through 2025, which is based on data from each of the cities and counties in the region. All projects in the region are assumed to contribute to regional air pollution and, as such, the emissions associated with these projects are modeled by the SCAQMD to provide an understanding of future air quality without additional emissions controls. Based on this modeling, if it is determined that pollutant concentrations exceed State or national ambient air standards, the SCAQMD, SCAG and California Air Resources Board develop additional emission control strategies to offset emissions and to reduce pollutant concentrations to below the standards.

In addition, the project site is within SCAG's Los Angeles City sub-area, and the City of Los Angeles estimates population growth to 2025 for the AQMP. SCAG has determined that, as long as the new population generated by a project is within the total population forecast for the sub-area in the project's buildout year, the proposed project would be consistent with the AQMP. As a result, cumulative impacts are offset by the emissions controls set forth in the AQMP. As discussed above in Question 3(a), the proposed project would be consistent with the AQMP. Furthermore, the proposed project is anticipated to be completed by 2007, which is prior to the AQMP growth forecast buildout year of 2025. Therefore, the proposed project would be consistent with the total population forecast in the AQMP, and the proposed project would have a less-than-significant cumulative operational impact on air quality.

4. BIOLOGICAL RESOURCES

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact. A significant impact would occur if a project were to remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the State or federal regulatory agencies cited. The project site and the surrounding area are currently dominated by dense urban development, consisting largely of commercial and parking land uses. Currently, the project site is occupied by a paved surface parking lot. Furthermore, the project site is surrounded by urban development with no significant areas of natural open space and no areas of significant biological resource value. No candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the California Department of Fish and Game (CDFG) or the U.S. Fish and Wildlife Service (USFWS) were found or are expected to occur on the project site, as the project site supports no habitat for such species. Therefore, the proposed project would have no impact on any sensitive species or habitat.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact. A significant impact would occur if riparian habitat or any other sensitive natural community identified locally, regionally, or by the State and federal regulatory agencies cited were to be adversely modified without adequate mitigation. The project site is located in a heavily urbanized area which has been previously developed. No riparian or other sensitive habitat areas are presently located on or adjacent to the project site. Therefore, implementation of the proposed project would not result in any adverse impacts to riparian habitat or other sensitive natural communities.

c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. A significant impact would occur if federally protected wetlands as defined by Section 404 of the Clean Water Act are modified or removed without adequate mitigation. The project site and surrounding area is currently dominated by dense urban development, consisting largely of commercial and parking land uses. Stormwater runoff from the project site is accommodated by City storm drain infrastructure. The proposed project would not significantly increase the amount of stormwater runoff from the site (see Question 8(c), below). The project site does not support riparian or wetland habitat,

as defined by Section 404 of the Clean Water Act (see Question 4(b), above). Therefore, no impact to riparian or wetland habitats would occur with implementation of the proposed project.

d) **Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

No Impact. A significant impact would occur if a project would interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites. The project site is located in a dense urban area that has been previously disturbed. No wildlife corridors are located on the project site or in the project area due to existing urban development. Therefore, no impact to fish or wildlife corridors would occur with implementation of the proposed project.

e) **Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

No Impact. A project-related significant adverse effect could occur if a project is inconsistent with local regulations pertaining to biological resources. Local ordinances protecting biological resources are limited to the City of Los Angeles Oak Tree Preservation Ordinance. The project site does not contain oak trees or other protected biological resources. Therefore, implementation of the proposed project would not affect any local polices or ordinances protecting or preserving biological resources and no impact would occur.

f) **Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**

No Impact. A significant impact would occur if a project is inconsistent with resource policies of any conservation plans of the types cited above. The project site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or State habitat conservation plan. Therefore, implementation of the proposed project would not conflict with any such plan and no impact would occur.

Cumulative Impacts

Less Than Significant Impact. Development of the proposed project in combination with the related projects would not significantly impact wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFG or the USFWS. No such habitat is expected to occur in the vicinity of the related projects and the proposed project due to the existing dense urban development. Local ordinances protecting biological resources are limited to the City of Los Angeles Oak Tree Preservation Ordinance. Although, the project site does not

contain any oak trees, there is a possibility that some of the related project sites could contain oak trees. Any removal of oak trees would be done in accordance with the City of Los Angeles Oak Tree Preservation Ordinance. Therefore, cumulative impacts to biological resources would be less than significant.

5. CULTURAL RESOURCES

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

No Impact. Section 15064.5 of the State CEQA Guidelines defines an historical resources as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if the proposed project were to adversely affect a historical resource meeting one of the above definitions.

The project site is currently a paved surface parking lot. No structures, which could have any historical significance, exist on the project site. Therefore, the development of the proposed project would not result in a change to the significance of a historical resource and no impact would occur.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

Potentially Significant Unless Mitigation Incorporated. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which meet the criteria for historical resources, as discussed above, or resources which constitute unique archaeological resources. A project-related significant adverse effect could occur if the project were to affect archaeological resources which fall under either of these categories.

No known prehistoric archaeological resources have been identified on the project site. Thus, implementation of the proposed project would not affect known archaeological resources. All portions of the project site have been developed and as such, have been subject to ground disturbing activities such as grading and excavating, which could have damaged, destroyed, or removed any archaeological resources that could have been present. The geologic investigation for the proposed project (see Section 6, Geology and Soils, below for additional information) revealed that fill material exists at depths between 1.5 and three feet below the surface. The native soils beneath the project site consist of

y to sandy clay and clayey silt, followed by silty sand, sand, and then varying layers of silty sand d sand to a depth of approximately 60 feet. These native earth materials consist of younger and older uvial soils that were deposited by the meandering rivers and streams, which are typical to this area of owntown Los Angeles. The proposed project includes a basement level, which would include cavation of the native alluvium. As there is a potential for the alluvium beneath the project site to ontain previously unknown archaeological resources, it is possible that unknown prehistoric rchaeological resources could be encountered during the project's construction phase. Without proper are during grading and excavation, unknown resources could be damaged or destroyed. Therefore, roject impacts on unknown archaeological resources would be potentially significant.

Mitigation Measures

Because the proposed project would result in potentially significant impacts to unknown archaeological resources, the mitigation measures listed below are recommended. Implementation of these measures would reduce this potentially significant impact to a less-than-significant level.

(5-1) Prior to excavation and construction on the project site, the prime construction contractor and any subcontractor(s) shall be cautioned on the legal and/or regulatory implications of knowingly destroying cultural resources or removing artifacts, human remains, bottles, and other cultural materials from the project site.

(5-2) If during any phase of project construction, any cultural materials are encountered, construction activities within a 50-meter radius shall be halted immediately, and the project applicant shall notify the City. A qualified prehistoric archaeologist (as approved by the City) shall be retained by the project applicant and shall be allowed to conduct a more detailed inspection and examination of the exposed cultural materials. During this time, excavation and construction would not be allowed in the immediate vicinity of the find. However, those activities could continue in other areas of the project site.

(5-3) If any find were determined to be significant by the archaeologist, the City and the archaeologist would meet to determine the appropriate course of action.

(5-4) All cultural materials recovered from the site would be subject to scientific analysis, professional museum curation, and a report prepared according to current professional standards.

If human remains are discovered at the project site during construction, work at the specific construction site at which the remains have been uncovered shall be suspended, and the City of Los Angeles Public Works Department and County coroner shall be immediately notified. If the remains are determined by the County coroner to be Native American, the Native American Heritage

Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains.

c) **Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

Potentially Significant Unless Mitigation Incorporated. A significant adverse effect could occur if grading or excavation activities associated with the proposed project would disturb paleontological resources or geologic features which presently exist within the project site.

No known unique paleontological resources have been identified on the project site. Thus, implementation of the proposed project would not affect known unique paleontological resources. All portions of the project site have been developed and as such, have been subject to ground disturbing activities such as grading, which could have damaged, destroyed, or removed any paleontological resources that could have been present. Thus, the potential for archaeological resources to occur in those areas is low. However, other portions of the project site contain older alluvium, which could potentially contain paleontological resources. The potential for unknown paleontological deposits to occur in these deposits cannot be ruled out. Without proper care during grading and excavation, unknown resources could be damaged or destroyed. Therefore, project impacts on unknown unique paleontological resources would be potentially significant.

The project site is relatively flat, and soils at the site consist primarily of younger and older alluvium. No unique geologic features are located on the project site. Therefore, the proposed project would not result in any impacts to unique geologic features.

Mitigation Measures

Because the proposed project would result in potentially significant impacts to unknown unique paleontological resources, the mitigation measures listed below are recommended. Implementation of these mitigation measures would reduce this potentially significant impact to a less-than-significant level.

(5-5) The project applicant shall identify a qualified paleontologist prior to any demolition, excavation, or construction. The City shall approve the selected paleontologist prior to issuance of the grading permit. The project paleontologist shall attend the pre-grading meeting to discuss how to recognize paleontological resources in the soil during grading activities. The prime construction contractor and any subcontractor(s) shall be cautioned on the legal and/or regulatory implications of knowingly destroying paleontological resources or removing paleontological resources from the project site.

(5-6) If paleontological resources are encountered during the course of site development activities, work in that area shall be halted and the project paleontologist shall be notified of the find. The project paleontologist shall have the authority to temporarily divert or redirect grading to allow time to evaluate any exposed fossil material. "Temporary" shall be two working days for the evaluation process.

(5-7) If the project paleontologist determines that the resource is significant, then any scientifically significant specimens shall be properly collected by the project paleontologist. During collecting activities, contextual stratigraphic data shall also be collected. The data will include lithologic descriptions, photographs, measured stratigraphic sections, and field notes.

(5-8) Scientifically significant specimens shall be prepared to the point of identification (not exhibition), stabilized, identified, and offered for curation to a suitable repository that has a retrievable storage system.

(5-9) The project paleontologist shall prepare a final report at the end of the earthmoving activities; the report shall include an itemized inventory of recovered fossils and appropriate stratigraphic and locality data. The project paleontologist shall send one copy of the report to the City of Los Angeles; another copy should accompany any fossils, along with field logs and photographs, to the designated repository.

d) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Potentially Significant Unless Mitigation Incorporated. A significant adverse effect would occur if grading or excavation activities associated with a project were to disturb previously interred human remains. No known human burials have been identified on the project site or vicinity. However, it is possible that unknown human remains could occur on the project site, and if proper care is not taken during project construction, damage to or destruction of these unknown remains could occur. Therefore, project impacts to human remains would be potentially significant.

Mitigation Measures

Mitigation Measures 5-1 through 5-5 listed above for the impacts to unknown prehistoric archaeological resources would also be applicable to impacts to human remains, and would reduce this potentially significant impact to a less-than-significant level.

:umulative Impacts

ess Than Significant Impact. Implementation of the proposed project in combination with the elated projects would result in the continued development (or redevelopment) of residential, :ommercial, and office land uses in the City of Los Angeles (see Figure 10 and Table 1). Impacts to :ultural resources tend to be site-specific and are assessed on a site-by-site basis. The extent of the :ultural resources (if any) that occur at the related project sites is unknown and, as such, it is not known whether any of the related projects would result in significant impacts to cultural resources. However, similar to the proposed project, such determinations would be made on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the proposed project's impacts to cultural resources concluded that, through the implementation of the mitigation measures recommended above, project impacts to cultural resources would be less than significant. Therefore, the proposed project would not contribute to any potential cumulative impacts, and cumulative impacts to cultural resources would be less than significant.

6. GEOLOGY AND SOILS

The following analysis is based upon the Preliminary Geotechnical Engineering Investigation Proposed Dormitory 1016 and 1020 South Olive Street, Los Angeles, California, prepared by Geotechnologies, Inc., August 2003, and Geotechnical Engineering Investigation Proposed Dormitory 1020 South Olive Street, Los Angeles, California, prepared by Geotechnologies, Inc., July 2004. These reports are included as Appendix D to this Initial Study.

a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. A significant impact may occur if a project is located within a State-designated Alquist–Priolo Zone or other designated fault zone, and appropriate building practices are not employed. The project site is located in the seismically active region of Southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City of Los Angeles. However, there are no active surface fault traces identified by the State, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning

Map, known to be present on the project site.[6] Therefore, the possibility of surface fault rupture affecting the project site would be considered remote, and the proposed project would not present any adverse impacts with respect to exposing people or property to hazardous conditions resulting from rupture of a known earthquake fault on the project site. Therefore, a less-than-significant impact would occur.

(ii) **Strong seismic ground shaking?**

Less Than Significant Impact. A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region. Southern California is active seismic region (UBC Seismic Zone IV). According to EQFAULT, the closest fault to the site is the Newport-Inglewood Fault, which is 6.0 miles from the project site. As with all properties in the seismically active Southern California region, the project site is susceptible to ground shaking during a seismic event. The main seismic hazard to the project site is moderate to strong ground shaking on one of the local regional faults. Although susceptible to ground shaking, the project site is not in a State-designated Alquist-Priolo Earthquake Zone, as discussed above.

The City of Los Angeles Uniform Building Code, upgraded since the 1994 Northridge earthquake, contains construction requirements, such as the use of shear panels and reinforcement, to assure that habitable structures are built to a level of acceptable seismic risk. Modern, well-constructed buildings are designed to resist ground shaking through the use of shear panels, frames and reinforcement. The potential seismic hazard to the proposed project site would not be higher than in most areas of the City of Los Angeles or elsewhere in the region. Therefore, the risks from seismic ground shaking are considered to be less than significant. Nonetheless, the following mitigation measure would reduce further this less-than-significant impact.

Mitigation Measure

(6-1) The project shall comply with the recommendations, listed on pages 13-32 of the Geotechnical Engineering Investigation File Proposed Dormitory 1016 and 1020 South Olive Street, Los Angeles, California prepared by Geotechnologies, August 2003; and pages 13-35 of the Geotechnical Engineering Investigation File Proposed Dormitory 1020 South Olive Street, Los Angeles, California prepared by Geotechnologies, July 2004 (see Appendix D).

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6 *Active faults are classified by the State Division of Mines and Geology as faults showing evidence of surface displacement within the last 11,000 years.*

(iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. A significant impact may occur if a project is located in an area identified as having a high risk of liquefaction and mitigation measures required within such designated areas are not incorporated into the project. Liquefaction describes a phenomenon where cyclic stresses, which are produced by earthquake-induced ground motions, create excess pore pressures in cohesionless soils. As a result, the soils may acquire a high degree of mobility, which can lead to lateral spreading, consolidation and settlement of loose sediments, ground oscillation, flow failure, loss of bearing strength, ground fissuring, and sand boils, and other damaging deformations. This phenomenon occurs only below the water table, but after liquefaction has developed, it can propagate upward into overlying, non-saturated soils as excess pore water escapes. The possibility of liquefaction occurring at a given site is dependant upon the occurrence of a significant earthquake in the vicinity, sufficient groundwater to cause high pore pressures, and on the grain size, relative density, and confining pressures of the soil at the site.

Liquefaction typically occurs in areas where the groundwater is less than 50 feet from the surface, and where the soils are composed of poorly consolidated, fine to medium-grained sand. In addition to the necessary soil conditions, the ground accelerations and duration of the earthquake must also be of a sufficient level to initiate liquefaction. Groundwater, at 60 feet below the existing ground surface, was not encountered to the total depth of exploration at the project site. According to the Liquefaction Evaluation Report[7] contained in the Seismic Hazard Evaluation of the Hollywood Quandrangle, the historic high groundwater level for the vicinity of the project site was 110 feet below the ground surface. In addition, the project site is not located in a State Seismic Hazard Zone for liquefaction. Therefore, the project site would not be considered prone to liquefaction. Therefore, a less-than-significant impact would occur.

(iv) Landslides?

No Impact. A significant adverse effect may occur if a project is located in a hillside area with soil conditions that would suggest high potential for sliding. The probability of seismically-induced landslides affecting the subject development is considered to be remote, due to the relatively flat or gently sloping nature of the site and surrounding areas. Therefore, no impact would occur.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. Due to previous grading on the

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7 *Loyd, Ralph C., and Mattison, Elise, 1998, Seismic Hazard Evaluation of the Hollywood 7.5-Minute Quadrangle, Los Angeles County, California, CDMG Open File Report 98-17.*

project site, no original topsoil remains onsite. The topography of the project site is relatively flat and it would be mostly paved-over (except for 5,630 square feet of landscaped area in the courtyard), so little soil would be exposed during the operation of the proposed project. Construction activities associated with the proposed project would expose soil and, thus, potentially erode soils. However, erosion controls would be implemented to reduce the effects of erosion during construction. All onsite grading and site preparation would comply with applicable grading and building permit requirements and Best Management Practices (BMPs). Onsite grading and site preparation would comply with all applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. Therefore, a less-than-significant impact would occur as a result of erosion or loss of topsoil.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact. A significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. Potential impacts with respect to liquefaction and landslide potential are evaluated in Questions 6(a)(iii) and (iv) above. The existing groundwater levels at the project site are not levels prone to liquefaction, nor is the proposed project site located in a State Seismic Hazard Zone for liquefaction. The probability of a seismically-induced landslide affecting the proposed project site is remote, due to its relatively flat topography.

Construction of the proposed project would comply with the City of Los Angeles Uniform Building Code, which is designed to assure safe construction, including building foundation requirements that are appropriate to site conditions. As discussed in the Geotechnical Engineering Investigation (Appendix D), due to the dense nature of the natural soils underlying the project site, the project site would not be prone to significant dynamic settlement. Therefore, a less-than-significant impact would occur.

d) Would the project be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Less Than Significant Impact. A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. The project site is not known to be an area susceptible to liquefaction (see Questions 6(a)(iii) and (iv) above). In addition, the sandy soils which would be exposed during the construction of the proposed basement level, are in the very low expansion range, while the soils at the existing grade are in the moderate expansive range. A test performed on a representative sample of the project site soils at a depth of 15 to 20 feet had an Expansion Index of 2, and tests performed on representative samples of the project site soils from zero to five feet had an Expansive Index of 60 to 75. Special considerations for expansive soils are required for concrete

avements at the ground surface level. Safe construction would be assured through compliance with the City of Los Angeles Uniform Building Code, which includes building foundation requirements appropriate for site-specific conditions. Therefore, a less-than-significant impact would occur.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. A significant impact may occur if a project is located in an area not served by an existing sewer system. The project site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impact would occur.

Cumulative Impacts

No Impact. Development of the proposed project in conjunction with the related projects would result in further "infilling" of various land uses in the City of Los Angeles area. Geotechnical hazards are site-specific and there is little, if any, cumulative relationship between development of the proposed project and the related projects. As such, construction of the related projects is not anticipated to combine with the proposed project to cumulatively expose people or structures to such geologic hazards and landslides and/or unstable soils, or to increase the potential for soil erosion or the loss of topsoil. Therefore, no cumulative geological impacts are anticipated from the proposed project and the related projects.

7. HAZARDS AND HAZARDOUS MATERIALS

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

No Impact. A significant impact may occur if a project involves use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. Other than typical cleaning solvents used for office and dormitory purposes, no hazardous materials would be used, transported or disposed of in conjunction with the routine day-to-day operations of the proposed project. Therefore, no impact would occur.

b) Would the project create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project could potentially pose a hazard to nearby sensitive receptors by releasing hazardous materials into the environment through accident or upset conditions. The project site is currently paved entirely with a surface parking lot. As such, no Poly-Chlorinated Biphenyls (PCBs), Asbestos Containing Materials (ACMs) or Lead-Based Paint occur within the project site. In addition, as mentioned in the Update Phase I Environmental Site Assessment Report prepared by Converse Consultants on January 17, 2005, no aboveground or underground storage tanks exist within the project site.

Oil Wells

Based on the zoning for the project site, oil drilling activities are permitted to occur onsite. However, as stated in the Update Phase I Environmental Site Assessment Report, and confirmed with a site visit by Christopher A. Joseph & Associates, no oil wells or gas wells are located on the project site or adjacent properties.

Methane Gas

The presence of methane gas in the subsurface is common within former oil production areas and other locations where organic material, such as grass, leaves, wood, manure, etc., are present in the soil. Methane is generated by the biodegradation of organic matter in the absence of oxygen. Methane is not toxic, however, it is combustible and potentially explosive at concentrations above 53,000 parts per million (ppm) in the presence of oxygen. While non-pressurized methane is normally not problematic, if the gas accumulates to high concentrations and becomes pressurized, detectable levels may enter the interior of a structure through cracks or other penetrations present in floor slabs.

The project site is located within a methane gas zone, and thus, methane gas may be present or may potentially be present in the future in the subsurface beneath the project site. In accordance with the City of Los Angeles Department of Building and Safety (LADBS) Methane Ordinance ("Ordinance"), the project site is subject to further subsurface investigation to determine the extent of methane beneath the proposed structures, and to develop an appropriate methane mitigation plan. Pursuant to the Ordinance, the LADBS has the authority to withhold permits on projects located within a Methane Zone or Methane Buffer Zone, as established under Sections 91.7101 et seq. of the LAMC. Building permits may be issued upon submittal of detailed plans that show adequate protection against flammable gas incursion by providing the installation of suitable methane mitigation systems. The Ordinance applies to all new buildings and paved areas located within a Methane Zone or Methane Buffer Zone. Accordingly, as provided in the mitigation measure below, the Project Applicant would be required to

complete a detailed methane report to document the potential for methane hazards and prescribe specific Methane Mitigation Standards to reduce potential methane hazards to a less-than-significant level. With incorporation of the mitigation measure below, impacts associated with methane gas would be reduced to a less-than-significant level.

Mitigation Measure

(7-1) In accordance with the LADBS Methane Ordinance (2004), prior to issuance of a building permit, the Project Applicant shall submit a detailed plan that demonstrates adequate protection against flammable gas incursion by providing the installation of suitable methane mitigation systems, if warranted, based on further site specific subsurface investigations. Methane Mitigation Standards shall be implemented in accordance with Section 91.7102 of the LAMC, and as directed and approved by the Department of Building and Safety and Los Angeles Fire Department.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. A significant adverse effect may occur if a project site is located within one-quarter mile of an existing or proposed school site and is projected to release toxic emissions which pose a health hazard beyond regulatory thresholds. There are no schools or proposed schools located within one-quarter mile of the project site. The nearest school, 9th Street Elementary, is approximately one mile east of the project site. In addition, as stated in Section 7(a), above, the proposed project would use, at most, minimal amounts of hazardous materials for routine cleaning and, therefore, would not pose any substantial potential for accident conditions involving the release of hazardous materials. Thus, there would be no impact concerning emission of hazardous materials near an existing school or proposed school.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The following analysis is based upon three reports prepared by Converse Consultants:

- Phase I Environmental Site Assessment, APN 5139-012-008 and APN 5139-013-009, August 12, 2003;
- Phase I Environmental Site Assessment, 1026 and 1032 South Olive Street, April 5, 2004; and
- Updated Phase I Environmental Site Assessment, 1016, 1026 and 1032 South Olive Street, January 17, 2005.

The project site consists of four parcels-APN 5139-012-008, 5139-012-009, 5139-012-007 and 5139-011-012. The Phase I prepared in August 2003 addressed the first two parcels, while the Phase I prepared in April 2004 addressed the second two parcels. The Phase I prepared in January 2005 was an update to all four parcels. These three reports are available for public review at the Community Redevelopment Agency, 354 South Spring Street, Suite 700 in the City of Los Angeles.

No Impact. California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if a project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

A review of the most current databases and files from federal, State, and local environmental regulatory agencies was conducted to identify use, generation, storage, treatment or disposal of hazardous materials and chemicals, or release incidents of such materials, which may impact the proposed project. The three Phase I Environmental Site Assessments include a database search of hazardous material sites that are listed pursuant to Government Code Section 65962.5. The project site is not included on any of the applicable lists. Two adjacent properties were identified on the Hazardous Waste Information System (HAZNET); however, as stated in the August 2003 Phase I, these properties do not have the potential to impact the project site due to the type of regulatory listing. Therefore, as the project site is not included in any hazards list and would not be impacted by any adjacent hazardous sites, no impact would occur.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

No Impact. A significant impact may occur if a project is located within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard. The nearest airports are the Compton Airport and El Monte Airport, which are located approximately 14 miles to the south and approximately 15 miles to the east, respectively. As such, the proposed project is not included in any airport land use plan.[8] Therefore, no impact would occur.

[8] *Los Angeles County Department of Regional Planning, Los Angeles County Airport Land Use Commission Comprehensive Land Use Plan, December 19, 1991.*

) For a project within the vicinity of a private airstrip, would the project result in a safety iazard for people residing or working in the project area?

No Impact. A significant impact would occur only if a project were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. The proposed project is not located in the vicinity of a private airstrip. Therefore, no impact would occur.

g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan. The proposed project is not located on or near an adopted emergency response or evacuation plan.[9] Development of the project site may require temporary and/or partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. The proposed project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access or travel upon public rights-of-way. Therefore, the proposed project would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan, and no project impact would occur.

h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. A significant impact may occur if a project is located in proximity to wildland areas and poses a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The project site is located in a dense urban area of the City that does not include wildlands or high fire hazard terrain or vegetation and, therefore, is not subject to hazards from wildland fires.[10] Consequently, no impact would occur.

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9 *Los Angeles City Planning Department, Environmental and Public Facilities Map: Critical Facilities & Lifeline Systems, September 1, 1996.*

10 *City of Los Angeles Department of City Planning, Zone Information and Map Access System, website: http://zimas.lacity.org, January 18, 2005.*

:umulative Impacts

.ess Than Significant Impact. Development of the proposed project in combination with the related ›rojects has the potential to increase the use, storage, transport, and/or release of hazardous materials. However, with implementation of Mitigation Measure 7-1, the potential impact associated with the proposed project would be reduced to a less-than-significant level.

With respect to the presence of hazardous substances associated with the related projects, each related project would be evaluated for potential threats to public safety. This would occur for each individual project affected, in conjunction with development proposals on these properties. Furthermore, local municipalities are required to follow local, State and federal laws regarding hazardous materials. Therefore, assuming compliance with local, State and federal laws pertaining to hazardous materials, cumulative impacts would be considered less than significant.

With respect to hazards from wildfires, the proposed project area (including the related projects) is an urbanized portion of Los Angeles that does not include wildlands or high fire hazard terrain or vegetation. In addition, similar to the proposed project, none of the related projects are located within an airport land use plan or within the vicinity of a private airstrip. As such, no cumulative impact would occur.

8. HYDROLOGY AND WATER QUALITY

a) Would the project violate any water quality standards or waste discharge requirements?

No Impact. A significant impact may occur if a project discharges water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into storm water drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

Construction activities associated with the proposed project would be subject to City inspection. Any construction work would be required to meet the National Pollution Discharge Elimination System (NPDES) requirements for storm water quality. The contractor would also be required to implement Best Management Practices (BMPs) for erosion control. In addition, the contractor would file a Notice of Intent with the State Water Resources Control Board and prepare a Storm Water Pollution Prevention Plan (SWPPP) prior to any construction activity. Implementation of the BMPs in the project's SWPPP and compliance with the City's discharge requirements would ensure that the project construction would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Therefore, the project's construction-related water quality impacts would be less than significant.

Vith respect to the operation of the proposed project, a SUSMP would be implemented which would nsure that potential impacts associated with water quality would be less than significant. Furthermore, he proposed project would not include industrial discharge to any public water system. With ppropriate project design and compliance with the applicable federal, State and local regulations, Code requirements and permit provisions, no impact would occur.

b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

No Impact. A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement or included withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge. Stormwater runoff from the proposed project would be accommodated by the existing City storm drain infrastructure. The historic high groundwater level in the vicinity of the project site is approximately 110 feet below the ground surface.[11] The proposed project would involve the development of a seven-story 154,000 gross square foot facility (110,000 net square feet) on an existing surface that is largely impermeable. Furthermore, the proposed project would include a landscaped courtyard, which would provide approximately 5,630 square feet of permeable surfaces. This represents an increase in the amount of permeable surfaces as compared to existing conditions. Therefore, the development of the proposed project would not substantially alter groundwater recharge. Project excavation would be restricted to the basement level, one level in depth. Furthermore, no water wells are proposed as part of the project. Therefore, the proposed project would not deplete groundwater supplies and no impact would occur.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?

No Impact. A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of the project. The project site is located in a dense urbanized area and no stream or river courses are located in the project vicinity. The closest water body to the project site is the Los Angeles River, located approximately 1.8 miles east of the project site. The project site is presently covered almost entirely with impermeable surface (i.e., asphalt). The proposed project would increase the

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[11] *Geotechnologies, Geotechnical Engineering Investigation Proposed Dormitory 1020 South Olive Street, Los Angeles, California, July 6, 2004.*

nount of permeable surfaces by providing an approximately 5,630 square feet of landscaping in a ourtyard. Runoff from the project site currently flows, and would continue to flow, towards existing City storm drains. Therefore, the potential impact associated with the alteration of existing drainage patterns would be less than significant.

d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

No Impact. A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the project site or nearby properties. Currently, runoff from the project site flows southwest along Olive Street to existing storm drain inlets at the intersection of Olive Street and 11th Street.[12] With the development of the proposed project, runoff would continue to be directed towards existing storm drain inlets at the intersection of Olive Street and 11th Street. Therefore, the proposed project would not substantially alter the existing drainage pattern of the project area. No project impact would occur.

e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project would increase the volume of storm water runoff to a level which exceeded the capacity of the storm drain system serving a project site. A project-related significant adverse effect would also occur if a project would substantially increase the probability that polluted runoff would reach the storm drain system. Runoff from the project site currently is and would continue to be collected on the project site and directed towards existing storm drains in the project vicinity. All contaminants gathered during such routine cleaning would be disposed of in compliance with applicable stormwater pollution prevention permits. Therefore, the proposed project would not provide substantial additional sources of polluted runoff to the storm drain system or increase storm water runoff from the project site above existing levels.

Construction-Related Project Impacts

Three general sources of potential short-term construction-related stormwater pollution associated with the proposed project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities

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12 *City of Los Angeles, Bureau of Engineering, Navigate LA, website: http://navigatela.lacity.org/maps/lamap.mwf, January 28, 2005.*

which, when not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment. Generally, routine safety precautions for handling and storing construction materials may effectively mitigate the potential pollution of stormwater by these materials. These same types of common sense, "good housekeeping" procedures can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes.

Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze, or other fluids on the construction site are also common sources of stormwater pollution and soil contamination.

In addition, grading activities can greatly increase erosion processes. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control offsite migration of pollutants. These BMPs are outlined in greater detail in the following Mitigation Measures section. When properly designed and implemented, these "good-housekeeping" practices are expected to reduce short-term construction-related impacts to a less-than-significant level.

Operation-Related Project Impacts

Activities associated with operation of the proposed project would generate substances that could degrade the quality of water runoff. The deposition of certain chemicals by trucks in the loading area could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. However, impacts to water quality would be reduced since the project must comply with water quality standards and wastewater discharge BMPs set forth by the City and the SWRCB. Furthermore, required design criteria, as established in the SUSMP for Los Angeles County and cities in Los Angeles County, would be incorporated into the proposed project to minimize the offsite conveyance of pollutants. Compliance with existing regulations would reduce the potential for water quality impacts to a less-than-significant level.

Mitigation Measures

(8-1) During construction, the project applicant shall implement all applicable and mandatory Best Management Practices (BMPs) in accordance with the SUSMP and City of Los Angeles Stormwater Management Program. These BMPs shall include, but not be limited, to the following:

- Erosion control procedures shall be implemented for exposed areas.
- Appropriate dust suppression techniques, such as watering or tarping, shall be used.

- Construction entrances shall be designed to facilitate removal of debris from vehicles exiting the site.
- Truck loads shall be tarped.

(8-2) All construction equipment and vehicles shall be inspected for and leaks repaired according to a regular schedule, specified in the Grading Plan approved by the Department of Building and Safety.

f) Would the project otherwise substantially degrade water quality?

No Impact. A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality. Other than the sources discussed above in Question 8(e), the proposed project would not include other potential sources of contaminants which could potentially degrade water quality. Therefore, the proposed project would not degrade water quality and no impact would occur.

g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. A significant impact would occur only if a project would place housing within a 100-year flood zone. The project site is not in an area designated as a 100-year flood hazard area.[13] Therefore, no impact would occur.

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. A significant impact may occur if a project were located within a 100-year flood zone, which would impede or redirect flood flows. The project site is not in an area designated as a 100-year flood hazard area.[14] Therefore, no impact would occur.

i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Less Than Significant Impact. A significant impact may occur if a project were located in an area where a dam or levee could fail, exposing people or structures to a significant risk of loss, injury, or

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[13] *City of Los Angeles, Bureau of Engineering, Navigate LA, website: http://navigatela.lacity.org/floodgis/maps/floodmap.mwf, January 28, 2005.*

[14] *Ibid.*

leath. According to the Safety Element of the City General Plan, the project site is potentially within in inundation area.[15] However, the failure of a levee or dam is considered to be a remote possibility hat would likely only occur during extremely severe seismic shaking conditions. Flooding from other sources is not expected (see Question 8(h)), so the minimal risk of flooding from potential dam or levee failure would not be exacerbated. Therefore, the potential impact associated with flooding due to the failure of a levee or dam would be less than significant.

j) Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?

No Impact. A significant impact may occur if a project site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (seiche and tsunami) or if the project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. The project site is not located in a potential tsunami zone.[16] The closest body of water to the project site is the Los Angeles River, which is approximately 1.8 miles east of the project site. With respect to the potential impact from a mudflow, the project site is relatively flat and is surrounded by urban development; thus, it does not contain any sources of mudflow. Therefore, there would be no impact associated with the risk of loss, injury, or death by seiche, tsunami, or mudflow.

Cumulative Impacts

Less Than Significant Impact. Development of the proposed project in combination with the related projects would result in the further infilling of uses in an already dense urbanized area. As discussed above, the project site and the surrounding area are served by the existing City storm drain system. Runoff from the project site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the related projects would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the project site and the related project sites, since this part of the City is already fully developed with impervious surfaces. Therefore, cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. In addition, all of the related projects would be required to implement BMPs and to conform to the existing NPDES water quality program. Therefore, cumulative water quality impacts would be less than significant.

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15 *City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit G, Inundation & Tsunami Hazard Areas, March 1994.*

16 *Ibid.*

). LAND USE AND PLANNING

a) Would the project physically divide an established community?

No Impact. A significant impact may occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project which involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community). The project site is located within the dense urban area of Downtown Los Angeles and is consistent with the existing physical arrangement of the properties within the vicinity. As discussed in Section II of this Initial Study, the proposed project includes the development of a 154,000 square foot seven-story facility on Olive Street, just south of Olympic Boulevard. With the proposed development of the proposed project, no streets or sidewalks would be permanently closed, and no separation of uses or disruption of access between land use types would occur. Therefore, implementation of the proposed project would not disrupt or divide the physical arrangement of the established community and no impact would occur.

b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the project site and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. The project site is located in an area that has been previously disturbed by the development of a surface parking lot, and is within the heavily urbanized area of Downtown Los Angeles.

The proposed project would be consistent with the surrounding commercial and residential development in the area. The General Plan of the City of Los Angeles provides general guidance on land use issues and planning policy for the entire City. All development activity on the project site is subject to the land use regulations of the Central City Community Plan, the City Center Redevelopment Plan (the "Redevelopment Plan"), and the City of Los Angeles Planning and Zoning Code (the "Zoning Code"), which are intended to guide local land use decisions and development patterns. The project site is located within the planning area of the Southern California Association of Governments (SCAG), the Southern California region's federally-designated metropolitan planning organization. The proposed project is also located within the South Coast Air Basin and, therefore, is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD).

Central City Community Plan

The Central City Community Plan (the "Community Plan") designates the project site for High Density Residential land uses. The Community Plan also delineates neighborhoods and districts in Downtown Los Angeles. The project site is in the South Park area, which is characterized by a mix of residential, medical, commercial, and retail uses.

The proposed project would offer social services to the community. The Community Plan addresses social services and recognizes that Downtown Los Angeles "offers the largest concentration of social services in the region and has the largest concentration of homeless people." The Community Plan sets forth policies that address social services, those social services policies that are applicable to the proposed project and the proposed project's consistency with those and other Community Plan policies are listed in Table 6 (Central City Community Plan Policy Analysis).

Zoning

The project site is currently zoned as [Q]R5-4D-O (Multiple Dwelling Zone, Height District 4, Development Limitation, Oil Drilling District). Pursuant to Section 12.12 of the Zoning Code, allowable uses in the R5 zone include a variety of multi-family residential uses such as apartments and group homes, churches, hotels, dormitories, retirements hotels, hospitals, etc. The proposed project would be a dormitory and job-training facility and, as such, would be consistent with the R5 zoning designation.

Height District 4 restricts the Floor Area Ratio (FAR) to 13:1 in the R5 zone. City of Los Angeles Ordinance 164307 sets forth Development Limitations and Qualified Conditions for the project site. The Development Limitations include limiting the FAR to 6:1. The total proposed floor area of the building would be 153,891 square feet and the project site area is 36,532 square feet. Thus, the proposed FAR would be 4.2:1, which is consistent with Height District 4 and the Development Limitation (i.e., FAR 6:1) in Ordinance 164307.

The Qualified [Q] Conditions include limiting allowable land uses to residential uses permitted in the R5 zone, consistency with the Community Plan and the Redevelopment Plan, and other similar conditions. Specifically, the [Q] Conditions limit land uses on the project site to: (1) residential uses that are permitted in the R5 zone; (2) hotels, motels, and apartment hotels; and (3) parking buildings. As discussed above, the proposed project would be a dormitory and job-training facility. Therefore, the proposed project would be consistent with the [Q] Conditions set forth in Ordinance 164307.

The Oil Drilling District designation permits oil drilling to occur on the project site. However, no oil wells currently exist on the project site and the project does not propose oil drilling. Therefore, this designation is inapplicable to the proposed project.

Table 6
Central City Community Plan Policy Analysis

Policy	Consistency Discussion
Residential	
1-2.1: Promote the development of neighborhood work/live housing.	**Consistent.** The proposed project would provide dormitory-style housing, training, dining, healthcare, and other services to the population that it serves onsite.
1-3.1: Encourage a cluster neighborhood design comprised of housing and services.	**Consistent.** As discussed above, the proposed project would include both housing and services onsite.
Social Services	
9-1.1: Preserve the existing affordable housing stock through rehabilitation and develop new affordable housing options.	**Consistent.** The proposed 200 dormitory-style rooms would provide 400 affordable beds to a population currently living at or below the poverty level.
9-2.2: Provide opportunities for daytime activities for the neighborhood including day centers, job-training centers, libraries, etc. Provide programmed and managed open spaces for recreational, cultural and survival needs including restroom and storage facilities.	**Consistent.** In addition to the 400 people that would live in the proposed building, the YWCA Job Corps program would provide job training services for an additional approximately 235 people. These 235 people would not live in the proposed building, but travel to and from the proposed job-training center during the day.
9-2.5: Coordinate among law enforcement, public agencies and social service providers to establish homeless services and programs that harmonize the provision of such services with the safety, cleanliness and quality-of-life concerns of the growing downtown residential community, visitor and tourism industry and myriad commercial and manufacturing businesses.	**Consistent.** As approximately half of the YWCA Job Corps clientele are homeless, the proposed project would provide services and residences to a substantial number of homeless people in Downtown Los Angeles.
Transportation	
11-7.9: Employers should be encouraged or mandated to participate in transit/rides share programs that match or exceed their automobile subsidies.	**Consistent.** The YWCA Job Corps would offer public transit passes to all employees free of charge, during the operation of the proposed project, to encourage public transit use.

City Center Redevelopment Project

The project site is located in the City Center Redevelopment Project Area (the "Redevelopment Area"). The Redevelopment Plan for the City Center Redevelopment Project (the "Redevelopment Plan") addresses social needs of the Redevelopment Area. For example, Section 411 of the Redevelopment Plan states:

> *The social needs of the community include, but are not limited to, day care facilities, educational and job training facilities, permanent and temporary housing for extremely low-, very low- and low-income persons, shelters, shelter beds, housing for the elderly, services for runaways, and counseling programs and facilities....*

The Redevelopment Plan also addresses development in the South Park area. It is recognized therein that "[s]pecialized facilities and amenities" are needed in conjunction with the development of new housing.

The proposed project would provide a social need for job training, health care, and very low-income housing to the community. Based on this and other similar guidance for new development in the Redevelopment Plan, the proposed project would be consistent with the Redevelopment Plan.

SCAG and SCAQMD

The proposed project is also located within the South Coast Air Basin and, therefore, falls under the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. The SCAQMD's Air Quality Management Plan (AQMP) was adopted in 1997 to establish a comprehensive air pollution control program leading to the attainment of State and federal air quality standards in the South Coast Air Basin, which is a non-attainment area. The AQMP also addresses the requirements set forth in the State and federal Clean Air Acts. The proposed project would not increase the frequency or severity of existing air quality violations, cause or contribute to new air quality violations, nor delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP. Therefore, the proposed project would be considered consistent with the AQMP. Based on the above, the proposed project would not conflict with applicable regional plans or policies by agencies with jurisdiction over the project.

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. A significant adverse effect could occur if a project site were located within an area governed by a habitat conservation plan or natural community conservation plan. As discussed in Question 4(f) above, no such plans presently exist which govern any portion of the project site. The project site is located in a dense urban area which has been previously disturbed through the development of commercial and parking land uses. Therefore, no impact would occur.

Cumulative Impacts

No Impact. Development of the related projects is expected to occur in accordance with adopted plans and regulations. It is also expected that most of the related projects would be compatible with the zoning and land use designations of each related project site and its existing surrounding uses. In